



May 8, 2022

Pacific Southwest Regional Office
Ecosystem Planning
Post Disturbance Hazardous Tree Management Project
1323 Club Drive
Vallejo, California, 94592

RE: Region 5 Post Disturbance Hazardous Tree Management Project

Thank you for soliciting public input regarding the Region 5 Post Disturbance Hazardous Tree Management Project. On November 15, 2021, Friends of Plumas Wilderness provided comments for scoping of the Post Disturbance Hazardous Tree Management Project. We appreciate having another opportunity to share our concerns and provide suggestions to further improve the project.

These comments are specific to the Plumas and Lassen National Forests of the Central Sierra Zone.

We appreciate that the Plumas National Forest has eliminated some of the more remote roads and trails from the Region 5 Post Disturbance Hazardous Tree Management Project. We commend the Lassen National Forest for not including any trails in the Hazardous Tree Management Project.

Our comments address general concerns and provide recommendations for specific routes on the Plumas and Lassen National Forests.

Our Concerns:

1. The project does not prioritize treatment areas. Efforts should focus first on Highways, then County Roads, and finally, Level 5, 4, and 3 NFS roads and trails. Removal of hazardous trees from frequently used high-level NFS roads will cost less and provide the greatest public benefit, while the removal of hazardous trees and fuels reduction on low-use Level 2 NFS roads and trails will have the greatest treatment cost and least public benefit. By including all roads in burned areas, it does not appear that the Lassen National Forest prioritized the treatment of roads. **The project should focus on hazardous tree removal where public benefit is high and treatment costs are low.**

2. By including hazardous tree removal in remote locations the project diverts limited resources away from our communities where fuels reduction treatments are most needed. Due to the difficulty and cost associated with removing trees and slash from remote locations, trees and debris generated from the felling of hazardous trees along trails and low-use Level 2 NFS roads will likely be lopped and scattered. This practice will increase ground fuels and elevate wildfire risks.

Plumas National Forest

Route	Recommendation	Justification
10M10	Do not remove hazard trees on the Winters Creek Trail. Consider closing this motorized route to increase the size of the Middle Fork Inventoried Roadless Area.	This remote route has very low use and causes significant erosion. Removing all hazard trees within 300' on either side and leaving slash will increase fire hazard.
10M11	Do not remove hazard trees on the route to Quartz Point. Consider closing this motorized route to increase the size of the Middle Fork Inventoried Roadless Area.	This route has low use and causes significant erosion. Removing all hazard trees within 300' on either side and leaving slash will increase fire hazard.

3. Hazardous tree removal along trails and low use Level 2 NFS roads will likely have significant environmental impacts. 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 ecosystems. **If the project includes low use Level 2 roads and trails, cumulative environmental impacts must be analyzed.**

4. Removing all hazard trees within 300' on either side of trails will detract from the natural character of these places and adversely impact the visitors' experience. We commend the Lassen National Forest for not including any trails in the hazardous tree removal project and urge the Plumas National Forest to follow suit. **We support long-term sustainable funding of trail management** in place of employing an emergency mentality to fell all hazard trees within 300' on either side of 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. Felling trees and lopping and scattering slash along trails will increase fire hazard.

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 construct 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.

Plumas National Forest

Route	Recommendation	Justification
7E13	Do not remove all hazard trees within 300' on either side of the North Hartman Bar National Recreation Trail.	Removing all hazard trees will significantly detract from the natural character of this National Recreation Trail.
6E11	Do not remove all hazard trees within 300' on either side of the Wildcat Trail.	Removing all hazard trees will detract from the natural character of this low use trail.
6E20	Do not remove all hazard trees within 300' on either side of the Mountain House Trail.	Removing all hazard trees will detract from the natural character of this low use trail.
9E08	Do not remove all hazard trees within 300' on either side of the Minerva Bar Trail.	Removing all hazard trees will detract from the natural character of this low use trail.
Granite Basin Trails	Do not remove hazard trees from trails within Granite Basin until NEPA for the Granite Basin OHV Trail Development Project is complete.	Trail and road reclassification should be completed prior to implementing hazardous tree removal.

5. Citizen Inventoried Roadless Areas, Special Interest Areas, proposed Special Interest Areas, and eligible Wild & Scenic Rivers will be compromised by hazard tree removal. We are concerned that implementation of Region 5 Hazardous Tree Removal Management in these areas will degrade values for which they were protected or preclude them from being protected in the future. We recommend that the Forest Service not remove hazard trees from these unique areas.

Plumas National Forest

Route	Recommendation	Justification
21N25A	Do not remove hazard trees within the Feather Falls Scenic Special Interest	Prior to the North Complex the area was inaccessible by OHVs as it was

	Area along Watson Ridge. Consider closing this unused route to expand the Bald Rock Inventoried Roadless Area.	behind a Sierra Pacific Industries locked gate.
6M46 / 7E18	Do not remove hazard trees along the Little North Fork of the Middle Fork Feather River.	This is an eligible Wild & Scenic River and hazard tree removal may make it ineligible for designation.
24N02Y	Do not remove all hazard trees within 300' on either side of the road within the proposed Dixie Mountain Special Interest Area.	Potential champion western junipers with picturesque growth forms can be found here. The sparse vegetation and rockiness may have protected these individuals from wildfire. This species is known to reach an estimated age of 3,000 years. Please do not cut these trees down, even if they were killed by fire.

Lassen National Forest

Route	Recommendation	Justification
29N40	Do not remove hazard trees on 29N40.	These remote roads receive little use. Hazard tree removal would be costly. Lopping and scattering slash would increase fire hazard. Consider expanding the Wild Cattle Mountain Inventoried Roadless Area, which has been recommended for Wilderness by the Lassen National Forest.
29N02Y	Do not remove hazard trees on 29N02Y.	
29N02YA	Do not remove hazard trees on 29N02YA.	
26N74	Do not remove hazard trees on 26N74E	This remote road receives little use. Hazard tree removal would be costly. Lopping and scattering slash would increase fire hazard. Consider expanding the Chips Creek Inventoried Roadless Area.

6. Mature and old-growth green trees should not be removed. [Large-diameter trees \(>21"\) store disproportionately massive amounts of carbon](#); 30% of live tree biomass is stored in the largest 1% of trees in the United States. Heavy early winter snows and strong winds of the 2021-22 winter toppled an unprecedented number of trees. The live trees that remain standing should not be felled in the name of hazard tree removal. These large, green trees pose little threat to the public. Felling trees and leaving woody debris on the forest floor creates a greater threat than leaving large, green trees standing.

President [Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Economies](#) mandates that the Secretaries of Agriculture and Interior define and inventory mature and old-growth forests. Large trees (>21" DBH) sequester a disproportionate amount of carbon and help mitigate climate change. Mature and old-growth trees should not be felled. The removal of small diameter trees (<21" DBH), which have become superabundant with over 100 years of fire suppression, is where the Forest Service should focus its efforts.

7. Do not remove hazardous trees and lop and scatter limbs on Level 2 roads. We strongly believe the Forest Service should focus hazardous tree management along high use roads. The Forest Service should not fell hazardous trees along low use roads and lop and scatter limbs. A recent Oregon State University study which evaluated 22,026 wildfires occurring in the Western United States between 1992 and 2019 found:

“ignitions and area burned increased with road density, which we attribute to increased human-caused ignitions along road corridors that provide easy access to flammable vegetation in and around national forests”.

Our Recommendations:

- 1) Prioritize where hazardous tree removal will occur. Focus hazard tree removal where public benefit is high and treatment costs are low.
- 2) Do not focus all Forest Service resources on hazardous tree management. Fuel treatments in unburned areas around communities should be priority one.
- 3) Do not remove hazardous trees from low use Level 2 NFS roads.
- 4) Do not remove all hazardous trees within 300' on either side of trails.
- 5) Do not remove hazardous trees from Wilderness, Inventoried Roadless Areas, Citizen Inventoried Roadless Areas, Eligible Wild & Scenic Rivers, Special Interest Areas, or Proposed Special Interest Areas.
- 6) Do not remove mature and old-growth trees (>21" diameter).
- 7) Do not fell hazardous trees on low use roads and lop and scatter limbs.

The next fire will come and the Forest Service will have much more community trust and support if they focus the majority of their fuels treatment work close to our communities where wildfire threat to investment is the highest. The Forest Service will continue to lose trust by felling trees and scattering slash in remote locations where the threat to public safety is low and tree removal will likely have more negative impacts than benefits.

Sincerely,



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