



January 22, 2024

RE: Beckwourth Roadside Reforestation Project

ATTN: Michael Rahe, District Ranger  
Beckwourth Ranger District  
23 Mohawk Road  
P.O. Box 6  
Blairsden, CA 96103

ATTN: Kristin Winford, Project Leader  
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Friends of Plumas Wilderness (FoPW) strongly supports Plumas National Forest (PNF) efforts to 1) improve ecosystem health, resilience, and other watershed and habitat conditions and 2) reestablishing the composition, structure, pattern, ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions through actions proposed in the Beckwourth Roadside Reforestation Project (herein referred to as the Project). In the past five years, 64% of the PNF has burned, 11% burned at high severity. In addition to the goals stated above, there is a need for restoring a diversity of habitat types, including culturally significant species. Our comments address the public comment process, 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.

**Public Comment Process.**

In scoping for future projects, FoPW requests that the PNF provide GIS information used in the maps included in Proposed Action documents to allow for the community to analyze the information presented during the scoping process. FoPW will provide the PNF with GIS layers of Special Land Designations - areas which have been identified by the FS and NGOs that have unique ecological values. Treatments within these areas should not harm the values these areas are intended to protect.

**Treatments**

**Planting Areas**

Reforestation efforts should focus on creating a diversity of age classes of all native habitat types rather than focus solely on preventing the long-term conversion of coniferous forests to

shrub lands. Vast tracts of even-aged coniferous forests provided favorable conditions for the rapid spread of wildfire across the Northern Sierra in recent years. Recreating forest conditions which led to the largest single wildfire in California's recorded history, even-aged coniferous forests, is undesirable and unlikely, given climate projections. The Project should employ an array of treatments which emphasize restoring a diversity of species and age classes and acknowledge sensitive ecological (e.g. rare plants within the Dixie Mountain Proposed Special Interest Area) and cultural (e.g. plants used by Indigenous communities) values.

#### Herbicide Application and Reforestation

FoPW led the effort to stop the aerial application of herbicides on Region 5 Forest Service lands in the 1980's. We are glad to see that no aerial spraying is proposed in the Project as aerial application indiscriminately impacts non-target species. FoPW does not support the use of herbicides in or adjacent to areas with special designations. If the PNF must use targeted foliar application to tip the scale in promoting conifer growth, the PNF should do so only when absolutely necessary and when outside of areas with special designations. FoPW does not endorse broadcast herbicide applications. FoPW requests that the PNF delineate the total acreage out of the 400 acres proposed for reforestation where herbicide will be applied. If herbicide is applied, the public needs to be informed of the type of herbicide used, location of application, and time of application. Clearly labeled signage and flagging should be used to delineate areas where herbicides have been applied to prevent further human exposure.

The processing of 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 and non indigenous populations alike, we strongly recommend that the PNF hire Indigenous people as consultants to survey all areas where herbicides will be applied to identify and avoid culturally significant plants.

#### Mature and Old-growth Forests

FoPW reviewers of the Proposed Action document 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 Project. FoPW recommends *clear demonstration* of how findings from FS-1215a were integrated into the Project.

FoPW has worked for nearly fifty years to protect the few remaining stands of old-growth forests on the PNF 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 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**

None of the maps presented to the public during scoping included areas with special designations, such as proposed Special Interest Areas or eligible Wild & Scenic Rivers. Not including areas with special designations on public-facing materials gives the impression that the Forest Service and planning partners do not acknowledge the unique values these areas have been recognized for. Using forest restoration and fuels treatment methods appropriate for each type of special designation will provide a diversity of approaches to forest management and increase the likelihood of successfully meeting management objectives while protecting the unique values of these areas.

### **Citizen Inventoried Roadless Areas**

In 2017, The Wilderness Society completed a field inventory of roadless areas on the Plumas National Forest. Several of TWS Citizen Inventoried Roadless Areas are located within the Project Area. Special consideration should be given to retaining these intact roadless areas as they provide important refuges for wildlife and opportunities for unconfined recreation and solitude. Fuel treatments should emphasize lower impact methods such as prescribed fire and hand-thinning, piling, and burning rather than the use of machinery. If roads are needed to treat fuels, they should be temporary, for administrative use only, and obliterated immediately after treatment. Special care should be given in CIRAs to prevent the spread of non-native species and motorized trespass. FoPW can provide GIS layers of Citizen Inventoried Roadless Areas identified by The Wilderness Society to appropriate PNF staff.

### **Eligible Wild & Scenic Rivers**

The Proposed Action document does not list any of the Eligible Wild Rivers located within the Project Area. Mo Bisipi Creek is an eligible Wild & Scenic Rivers within the Project Area and should be delineated in the Proposed Action document. Treatments occurring adjacent to Eligible Wild Rivers should not degrade values or adversely affect the character of areas nor the potential for these lands to be designated as Wild & Scenic in the future. FoPW supports manual treatments, pile burning and prescribed fire along Eligible Wild & Scenic Rivers in the Project Area.

### **Special Interest Areas**

Special Interest Areas (SIAs) are managed to protect unique scenic, botanic, or geologic values. The Proposed Action document does not include any note of the Dixie Mountain Proposed SIA that is located in the Project Area in the Dixie Lookout Units. Evidence of the locations noteworthiness can be found on FoPW's Terrane Blog:

<https://plumaswilderness.org/om-chumi-peak-of-names-and-special-interest/>

*Dixie Mountain Proposed Special Interest Area (California Native Plant Society, 1991).*

This area was originally proposed in the Plumas Management Plan as a scenic area and to interpret geologic formations, but was not formally designated. Dixie Mountain, at 8300 feet, is the second highest peak on the Plumas, and contains breathtaking views of the surrounding country, into the Nevada desert. The western flank of the mountain is steep, unaccessed, with large basalt cliffs that support raptors and falcons. The more gently sloping eastern flank contains conifer forests that have been partially logged, with scattered old growth Jeffrey and Western White Pine.

High plant diversity is present in this area. The rare *Ivesia baileyi* occurs on basalt outcrops near the summit. The easternmost population of *Silene invisa* is found in upper elevation forests on the eastern flank, and is a disjunct population, separated from other known populations by many miles. High elevation conifers, including western white pine and mountain hemlock are unique to the ranger district. Krumholtz growth forms on conifers occur along the summit- this includes western juniper, mountain mahogany, and western white pines that may be quite old. Potential, champion western junipers with picturesque growth forms can be found- the surrounding sparse vegetation and rockiness may have protected these individuals from wildfire. (This species is known to reach an estimated age of 3000 years under favorable conditions).

Mechanical thinning within SIAs should be minimized as the use of heavy equipment compacts soils and spreads invasive plant species. FoPW recommends that the PNF work closely with the California Native Plant Society to develop treatments specific to each SIA. California Native Plant Society staff possess a comprehensive knowledge of California's native plants and have training and experience related to the development of fuels reduction treatments.

FoPW commends the PNF for initiating the Beckwourth Roadside Reforestation Project and appreciates the opportunity to provide input on the process. If there are any questions related to our comments please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Ramsey".

Elizabeth Ramsey, Conservation & Planning Director  
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#### **Available Relevant GIS layers**

- Citizen Inventoried Roadless Areas (The Wilderness Society)
- Proposed Special Interest Areas (California Native Plant Society)
- Eligible Wild & Scenic Rivers (National Wild & Scenic River System)