November 6, 2023

RE: Community Protection Eastside Project #62897

ATTN: Ryan Bauer, Project Coordinator
Plumas National Forest Supervisor's Office
Plumas National Forest
159 Lawrence St.
Quincy, CA 95971

Friends of Plumas Wilderness (FoPW) strongly supports Plumas National Forest efforts to 1) reduce risk of wildfire impacts to communities and critical infrastructure and reduce the potential for extreme fire behavior in the Wildland Urban Interface, 2) improve road conditions for project access and community egress, 3) improve forest health and create a landscape more resilient to future disturbance and climate, 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 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

While FoPW acknowledges the time-sensitive nature of the proposed action, the organization does not support emergency authorization to expedite implementation. The use of emergency authorization may benefit short-term economic gain at the expense of long-term relationships between the Forest Service, partners, and the public. Using emergency authority years after a wildfire and reducing opportunities for formal public involvement prior to a final decision does not build public trust.

Rather than seek emergency authorization years after wildfires, FoPW recommends that the Forest Service accomplish long-term forest health goals during wildfire incidents. Instead of giving all decision-making authority to wildfire operations leadership, local Forest Service leaders should retain authority and accomplish anticipated work during the emergency. FoPW requests that the PNF pursue a Forest Plan amendment that allows wildfire response to achieve resource based objectives.

Tribes, NGOs, and members of the public possess a broad and varied knowledge of lands and waters administered by the Forest Service which is relevant to this project. Public comment and review prior to implementation is essential given the scale and scope of the project.

FoPW will provide 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 Eastside Community Protection Project should employ an array of treatments which emphasize restoring a diversity of species and age classes and acknowledge sensitive ecological and cultural (e.g. plants used by Indigenous communities) values.

The reestablishment of oaks and other culturally significant plants should be incorporated into the Eastside Community Protection Project as they provide important sources of food, materials, and wildlife habitat.

FoPW requests that PNF botanists collaborate with silviculture to plant native hardwoods such as black oak and other plants as well as replanting conifer seedlings to promote biodiversity. The PNF should include oaks in their carbon sequestration and reforestation portfolio as oaks are more fire/drought resilient and longer-lived than conifers.

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 Eastside Community Protection 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 6,802 acres to be prepared for planting 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 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 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.

Fuels Reduction

Past forest management practices have created dense, even-aged forests composed mostly of small and intermediate-sized conifers. As noted above, high severity fire is a consequence of past silvicultural practices. FoPW strongly supports the thinning of small and intermediate-sized conifers and the use of prescribed fire to produce a more diverse mosaic of age classes and ecosystems and protect large, fire-resistant trees. 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. Fuel reduction projects have the potential to cause infestations of insects and diseases and start wildfires. Best available science and frequent consultation with entomologists should be incorporated into every aspect of fuels reduction projects, from planning and prescription writing to implementation.

The Eastside Community Protection Project proposes project-specific Forest Plan amendments to improve forest resiliency and protect communities from catastrophic wildfires. In particular, the project proposes using the metric of relative stand density index instead of basal area and canopy cover to meet forest health and resiliency goals. FoPW understands that forests need to be made less dense through fuel reduction efforts and metrics such as basal area, canopy cover, and tree diameter requirements limit the management actions that can be taken to address forest resiliency. Across the Sierra Nevada, large diameter trees (trees with diameter at breast height greater than 24 inches for this example) have been removed through timber harvest reducing their numbers by at least 50% since 1930, and small trees (4 to 12 inches dbh) have doubled in density over the same time period (McIntyre et al 2015). Recently, two studies from the Pacific Northwest have suggested that diameter limits need to be revised to meet restoration targets for resiliency (Johnston et al 2021, Hessburg et al 2021). Specifically, these studies highlight how past logging has resulted in the growth of many large, shade-tolerant trees that are less fire resilient and impede the ability for large pines to recruit. These studies are focused on dry, inland forests of Oregon and Washington and while the forest types are similar in many ways to Sierran forests, to date there are no publications using field data that explicitly address diameter limits in the Sierra Nevada. Identifying and retaining mature and old-growth conifers is an important strategy for carbon sequestration as these conifers are more fire/drought resilient and sequester far more carbon than young conifers.

Due to the lack of empirical evidence for Sierra forests, FoPW proposes gathering field plot data in representative sample areas to inform the discussion about whether the project specific plan amendment is needed to meet project restoration goals. FoPW is interested in

helping to design and execute a study similar to Johnston et al (2021) with the Plumas National Forest, but such an endeavor will take at least one year and is currently unfunded. With empirical data for the entire project area not available at this time, we recommend that the PNF withdraw the project amendment that allows for the removal of >30" dbh trees. Additionally, FoPW strongly suggests adopting sufficient sideboards on the amendment to constrain the activity and gain greater buy-in and support from project critics.

Given that there is a lack of robust, peer-reviewed support for the need to harvest >30" trees in this region, we request the following sideboards, adapted from the North Yuba Project, at minimum, if the >30" tree cutting amendment is included:

1. Include a constraints filter in decision trees to guide >30" tree removal in any area the amendment is proposed.
2. In subsequent SIRs/RODs: Field surveys of large trees completed alongside other resource surveys shall determine departure from desired conditions. Field data should be modeled in Forest Vegetation Simulator (FVS) to show that desired conditions cannot be met within 20 years of treatment unless those trees are removed.
3. Use a 30" cap for pines, and a 39.9" for other species, with preference for removal of white fir over other species.
4. Retain snags and downed logs according to forest plan direction - girdle 30-39.9" trees to meet the retention direction before any trees are removed.
5. No 30-39.9" trees shall be harvested to create 1-3 acre openings.

<u>Prescribed Fire</u>
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.

<u>Mature and Old-growth Forests</u>
FoPW reviewers of the 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: <u>Mature and Old-growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and BLM</u>. It is unclear how these findings have been incorporated into the Project. FoPW recommends the Project *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

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. The 5,083 acre Cottonwood Peak Citizen Inventoried Roadless Areas is located within the Project area. Special consideration should be given to retaining this intact roadless area as it provides important refuges for wildlife and opportunities for unconfined recreation and solitude. Any proposed temporary roads should be for administrative use only and restored after field reduction work is completed. 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.

Special Interest Areas

Special Interest Areas (SIAs) are managed to protect unique scenic, botanic, or geologic values. The EA states that the 2,167.70 acre Eastern Escarpment proposed SIA is located in the Project Area. This area occupies a portion of the north facing slope and summit of the Diamond Mountains. The steep, granitic slopes are dominated by a Sierran Mixed Conifer Forest including ponderosa, jeffrey and sugar pines, incense cedar, Douglas fir, white fir, black oak and bigleaf maple. Douglas fir, black oak and sugar pine are considered unique occurrences for these species within the Great Basin Hydrologic Province. Several granitic knobs occur along the steep north slope, providing scenic, open forests and outcrops. The summit is dominated by large, scattered Jeffrey and Ponderosa pines interspersed with granite boulders. Over all, the forest appears to contain trees of all ages, with a significant old growth component. Due to the low rainfall and extreme edge of the range, the conifers at this site may be uniquely adapted to these conditions. Unusual cone formations were noted, including some very small ponderosa pine cones (at maturity, about 3" long), and smaller than normal Douglas fir and sugar pine cones. Portions of this area may meet a Research Natural Areas target.

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 fuels reduction 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.

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.

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

Sincerely,

Charles Schrammel, Executive Director
Friends of Plumas Wilderness
546 Lawrence St • PO Box 1441
Quincy, CA 95971
(530) 208-9549

Literature Cited

Hessburg, P.F., S. Charnley, A.N. Gray, T.A. Spies, D.W. Peterson, R.I. Flitcroft, K.L. Wendel, J.F. Halofsky, E.M. White, and J Marshall. 2021. Climate and wildfire adaptation of inland northwest US forests. Frontiers in Ecology and Environment doi: 10.1002/fee.2408.

Johnston, James D; Greenler, Skye M; Miller, Becky A; Reilly, Matthew J; Lindsay, Amanda A; et al. Ecosphere; Washington Vol. 12, Iss. 3, (Mar 2021). DOI: 10.1002/ecs2.3394

McIntyre, Patrick J., J.H. Thorne, C.R. Dolanc, A.L. Flint, L.E. Flint, M. Kelly, and D.D. Ackerly. 2015. Twentieth-century shifts in forest structure in California: denser forests, smaller trees, and increased dominance of oaks. PNAS 112(5).pp 1458-1463.

Available GIS Layers

- Inventoried Roadless Areas (United States Forest Service)
- Citizen Inventoried Roadless Areas (The Wilderness Society)
- Proposed Special Interest Areas (California Native Plant Society)
- Eligible Wild & Scenic Rivers (National Wild & Scenic River System)
- Research Natural Areas (United States Forest Service)
- Designated Wild & Heritage Trout Waters (California Department of Fish & Wildlife)