



November 15, 2021

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

RE: Scoping comments on Region 5 Post Disturbance Hazardous Tree Management Project

Thank you for soliciting public input regarding the Region 5 Post Disturbance Hazardous Tree Management Project. We appreciate the opportunity to share our concerns and provide suggestions on how to improve the project.

Friends of Plumas Wilderness is dedicated to studying, exploring, and maintaining the integrity of natural ecosystems where the Sierra and Cascades meet. **These comments are specific to the Lassen and Plumas National Forests of the Central Sierra Zone.**

Our organization was founded to protect old-growth forests north of Bucks Lake. Logging of the area was brought to public attention when a sawyer felled a tree on an occupied vehicle during the 4<sup>th</sup> of July weekend of 1970. Fortunately, nobody was hurt in the incident, which ultimately led to the formation of Friends of Plumas Wilderness, who spearheaded the decades long national campaign to designate the Bucks Lake Wilderness in 1984.

We commend Region 5 efforts to protect the health and safety of the public through the removal of post disturbance hazardous trees and appreciate that the Forest Service recognizes the need to reduce fuel loading associated with the felled hazardous trees. However, we have concerns that the project does not address the potential to adversely impact sensitive natural and cultural

resources the Forest Service is mandated to protect. **The project must balance public safety with the protection of sensitive resources found on our public lands.**

### **Our Concerns:**

**1. The project does not warrant an Emergency Situation Determination (ESD).** We understand the time sensitive nature of the project but strongly believe that the time it takes for public involvement, through the pre-decisional objection process, is worth it. Now is not the time for hasty decision making. The fires are out. **Engaging the public throughout the planning process will lead to a better project and allow the Forest Service to regain public trust and support.**

**2. The project does not prioritize treatment areas.** If it is truly an emergency, triage should be employed. Unless the Forest Service only focuses on hazardous tree removal for the next 3-5 years, the agency likely does not have the capacity to complete hazardous tree removal in all areas outlined in the ambitious proposal. Efforts should focus first on Highways, then County Roads, and finally, Level 5, 4, 3, and 2 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. **The project should focus on hazardous tree removal where public benefit is high and treatment costs are low.**

**3. 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. **Rather than focus on hazardous tree removal where there is little public benefit, the Forest Service would better serve the public by removing hazardous fuels around our communities within the Wildland Urban Interface.** There needs to be a balanced approach to protecting public safety. The Forest Service should focus on hazardous tree removal and treat unburned forests near communities. Investing limited resources and funds on projects near communities will likely have the greatest benefit when the next fires come.

**4. 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.**

**5. Removing hazard trees along 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 follow suit. **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 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.

**6. Citizen Inventoried Roadless Areas will be compromised by hazard tree removal.** Prior to the North Complex and Dixie fires, The Wilderness Society (TWS) inventoried roadless areas on the Plumas National Forest (2017) and Lassen National Forests (2019). Employing Wilderness direction outlined in Chapter 70 of the Land Management Planning Handbook, field crews provided an Inventory of Areas that may be Suitable for Inclusion in the National Wilderness Preservation System on the Plumas and Lassen National Forests.

We are concerned that implementation of Region 5 Hazardous Tree Removal Management in areas identified as Citizen Inventoried Roadless Areas will preclude them from being considered during revision of Land & Resource Management Plans. Therefore, we recommend that the Forest Service not remove hazard trees from Citizen Inventoried Roadless Areas identified by The Wilderness Society.

TWS maps of Citizen Inventoried Roadless Areas for the Plumas & Tahoe and Lassen & Modoc National Forests can be obtained from Matthew S. Dietz, Lead Ecologist, The Wilderness Society, [matt@twso.org](mailto:matt@twso.org), 415.398.1482.

### **Our Recommendations:**

- 1) Allow the public to provide input beyond scoping. Do not invoke an ESD.
- 2) Prioritize where hazardous tree removal will occur. Focus hazardous tree removal where public benefit is high and treatment costs are low.
- 3) Do not focus all Forest Service resources on hazardous tree management in burned areas. Fuels treatments in unburned areas around communities should be priority one.
- 4) Do not remove hazardous trees from low use Level 2 NFS roads.
- 5) Do not remove hazardous trees from trails, especially within Wilderness, Inventoried Roadless Areas or along Eligible Wild and Scenic Rivers.
- 6) Do not remove hazardous trees from areas identified by The Wilderness Society's Citizen Inventories of Roadless Areas on the Plumas and Lassen National Forests.

### **Our Role and Niche:**

We at Friends of Plumas Wilderness view our role as being a friend of public land managers and our niche to help them accomplish their mission and vision. In partnership with the Forest Service we have initiated volunteer monitoring programs in the Bucks Lake Wilderness and along Wild & Scenic Middle Fork Feather River. Together, we have educated the public about our local public lands through films, presentations, and events. In partnership with the Lassen National Forest we have brought diverse stakeholders together to initiate fire restoration in the Ishi Wilderness. Recently, our biggest challenge has become maintaining the integrity of natural ecosystems. This is in large part due to recent fires and fire suppression impacts within the Bucks Lake Wilderness, Inventoried Roadless Areas, Research Natural Areas, and Special

Interest Areas. Many hasty, costly decisions were made during the recent fires. Poor decision-making leading to long-term ecological and social impacts has made us lose trust in some local land managers.

**Our Hope:**

In the wake of the extensive fires that have burned our local public lands we need to work together to restore our forests, our communities, and their trust in the Forest Service. Our organization has been in existence for nearly half a century. We are here for the long haul. Now is not the time to make hasty, wasteful decisions. What we need now is well thought out plans that balance the benefits of public safety with environmental protection. We need to focus our limited resources on the most probable hazards. We strongly believe the Forest Service should focus hazardous tree management in high use areas and treat unburned forests around our communities. 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 investing everything in hazard tree removal, especially if it includes felling trees and scattering slash in wild, remote locations where the threat to public safety is low and tree removal will likely have more negative impacts than benefits.

Our hope is the Forest Service acknowledges our concerns, addresses them, and considers our recommendations. If there are any questions related to points raised in this letter please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrel Jury". The signature is fluid and cursive, with a long horizontal line extending from the start of the name.

Darrel Jury, President  
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