



CALIFORNIA  
NATIVE PLANT SOCIETY



**Wildlands  
Network**

September 9, 2024

RE: North Fork Forest Recovery Project #64028

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Friends of Plumas Wilderness (FoPW), the California Native Plant Society (CNPS), and Wildlands Network support Plumas National Forest (PNF) and Sierra Institute for Community and Environment (SI) efforts to reduce wildfire risk for local communities and improve forest resiliency in the face of climate change.

For a half century the mission of FoPW has been to study, explore and maintain the integrity of natural ecosystems where the Sierra and Cascades meet. Given our long-standing mission, our concerns and recommendations focus on balancing post-fire forest recovery with the protection of unique cultural and ecological values associated with predominantly natural ecosystems. Areas of utmost concern to our organization and its members are lands and waters with special designations and mature and old-growth forests.

Wildlands Network has been dedicated to reconnecting, restoring, and rewilding North America's landscapes to ensure that life in all its diversity can thrive. Our focus is on using science-based research and innovative policy to prevent biodiversity loss and promote climate-resilient ecosystems. Central to our mission is the protection and connection of wild spaces, and we collaborate with local partners and communities across the continent to safeguard these vital landscapes for future generations.

The California Native Plant Society (CNPS), a non-profit environmental organization with more than 13,000 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

On November 6, 2023, FoPW submitted comments for the Scoping phase of the North Fork Forest Recovery Project. In those comments we addressed lands and waters with special designations, mature and old-growth forests and recommendations regarding fuel treatments. Because the majority of concerns brought up in FoPW's Scoping comments were not addressed in the NFFRP Draft EA we are re-submitting our previous comments with updated information shown in **bold**.

## **EA vs EIS**

Given the scale and scope of this project, the intensity and methods of treatments, the number of priority non-native invasive species and the number of sensitive species and **sensitive** habitats present in the project area, and that only 22,711 of the 166,889 acres of the project (13.6%) have been surveyed there would be multiple opportunities for significant impacts to environmental resources due to project activities. Traditionally, the Forest Service has determined that an EIS was appropriate to evaluate the impacts for much smaller fuel reduction projects, such as the Strategic Community Fuelbreak Improvement Project in the Monterey Ranger District of the Los Padres National Forest. We feel that given the information provided in the EA that a Finding of No Significant Impacts (FONSI) would not be appropriate and that an Environmental Impact Statement (EIS) should be prepared for this proposal. An EIS would provide a more comprehensive view of the potential impacts of the project and provide additional opportunities for subject matter experts, local interests and the general public to contribute to the development of the project.

## **Special Land Designations**

None of the maps presented to the public during scoping meetings included areas with special designations, such as Wilderness, Research Natural Areas, Special Interest Areas, 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. Giant Sequoia National Monument Management Plan, Part 2, Table 4, pp. 38-41) includes treatments for all land allocations and provides a table showing which treatments are appropriate for each special designation.

**Figure A-4: Map of Designated Lands on p. 126 of the Draft EA does not include eligible Wild & Scenic Rivers or Citizen Inventoried Roadless Areas. To be consistent with [P.L. 90-542 The Wild & Scenic Rivers Act of 1968](#) and acknowledge the conservation values of Citizen Inventoried Roadless Areas documented by The Wilderness Society [the NFFRP Final EA must reference these unique lands and waters](#). FoPW can provide GIS layers of Citizen Inventoried Roadless Areas identified by The Wilderness Society to appropriate PNF and SI staff. For more information related to eligible Wild & Scenic Rivers or Citizen Inventoried Roadless Areas please contact Friends of Plumas Wilderness.**

## **Wilderness**

Treatments occurring adjacent to the Bucks Lake Wilderness should not degrade values the Wilderness was established to protect or adversely affect the character of roadless areas abutting the Wilderness and the potential for these lands to be designated as Wilderness in the future. Special precautions should be taken to reduce the likelihood of the spread of non-native plant species into the Wilderness. Likewise, extra effort should be taken to prevent motorized trespass into the Wilderness.

**FoPW supports the use of Prescribed Fire, Hand Thinning, and Mechanical Thinning in areas adjacent to Wilderness that are not identified as Citizen Inventoried Roadless Areas.**

**Vegetation Treatments and Post-Fire Fuels Reductions Treatments should reduce the need for the use of mechanized equipment associated with fire suppression operations.**

#### Inventoried Roadless Areas (IRAs)

The PAPN document indicates portions of the Grizzly Peak and Chips Creek Inventoried Roadless Areas are within the Project Area and the Keddie Ridge IRA is adjacent to the Project Area. To retain the primitive character of these areas, FoPW recommends that no new roads be constructed within IRAs and prescribed fire is the primary tool used to improve forest resilience. If temporary roads are constructed, they should be for administrative use only and obliterated to prevent non-system, user-created roads from encroaching into the IRAs. FoPW recommends PNF consult with FoPW regarding actions taken in and around any IRAs.

Plumas National Forest staff worked to naturalize the dozer line constructed within the Grizzly Peak IRA. However, the rock barrier constructed to prevent motorized trespass to Grizzly Peak is inadequate. If this portion of the IRA is within the NFFR project area, FoPW recommends providing a gate or more substantial barrier to stop motorized trespass to Grizzly Peak.

**FoPW supports the use of Prescribed Fire and Hand Thinning in Inventoried Roadless Areas as shown on the Proposed Vegetation Treatments and Proposed Post-Fire Fuels Reduction Treatments maps on p. 124 and 130 of the NFFR Draft EA. FoPW does not support the use of Mechanical Thinning in Inventoried Roadless 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 NFFR 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. Proposed roads and motorized routes should be aligned to retain the size and values of these roadless areas. 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 and SI staff.

**FoPW supports the use of Prescribed Fire and Hand Thinning in Citizen Inventoried Roadless Areas as shown on the Proposed Vegetation Treatments and Proposed Post-Fire Fuels Reduction Treatments maps on p. 124 and 130 of the NFFR Draft EA. FoPW does not support the use of Mechanical Thinning in Citizen Inventoried Roadless Areas.**

A portion of the 11-mile motorized trail shown on the Mt. Jura Area Proposed Trails Map A-11 (p. 133 of the Draft EA) encroaches within the 19,140 Mount Jura Citizen Inventoried Roadless Area. [The Travel Management Rule](#) requires that the Forest Service minimize environmental damage when planning motorized routes. This includes minimizing (1) the harassment of wildlife, (2) disruption of wildlife habitat, (3) damage to soil and vegetation, (4) minimizing conflicts between motor vehicles and other recreational uses/users of the

forest land. Roadless areas provide habitat for wilderness dependent species such as Gray Wolf. The CIRAs mapped by The Wilderness Society in 2017 preceded proposed motorized routes subsequently identified by Sierra Buttes Trail Stewardship which are identified on the Mt. Jura Area Proposed Trails Map. Development of the Mt. Jura Area motorized trail may increase conflict between existing recreational uses/users.

**In order to meet Travel Management Planning Minimization Criteria Friends of Plumas Wilderness and conservation allies demand that the PNF and SI minimize motorized trail development within the Mt. Jura CIRA. FoPW can provide GIS layers of Citizen Inventoried Roadless Areas identified by The Wilderness Society.**

#### Eligible Wild & Scenic Rivers

The PAPN document does not list any of the Eligible Wild Rivers located within the Project Area. The North Fork Feather River, East Branch North Fork Feather River, Indian Creek near Belden, Chips Creek, Indian Creek, Squirrel Creek, Yellow Creek, and Last Chance Creek are all eligible Wild & Scenic Rivers within the Project Area and should be delineated in the the PNPA 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 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.

**The NFFRP Draft EA does not make any mention of the eight Eligible Wild & Scenic Rivers located within the project area. This is an egregious oversight. It is imperative that eligible Wild & Scenic River segments are identified and analyzed in the NFFR Project EA. These free-flowing river segments have unique social and ecological values that must be maintained. Eligible Wild & Scenic Rivers should be shown on the Map of Designated Lands. Vegetation treatments and post-fire fuels reduction treatments should comply with [P.L. 90-542 The Wild & Scenic Rivers Act of 1968](#). The type of fuel treatment would depend upon the type of Eligible Wild & Scenic River segment: Wild, Scenic, or Recreational. FoPW supports the use of prescribed fire in all eligible Wild segments, Hand Thinning and Prescribed Fire in Scenic segments, and Prescribed Fire, Hand Thinning and Mechanical Thinning in Recreational segments. Treatments along any stretch of river should not create hazards to boaters or river recreationists.**

#### Special Interest Areas

Special Interest Areas (SIAs) are managed to protect unique scenic, botanic, or geologic values. The PAPN document states 33 acres of established SIAs and 9,684 acres of proposed SIAs are located in the Project Area. The majority of the Red Hill proposed SIA is within the Project Area. The Red Hill pSIA encompasses the largest ultramafic terrane in the Northern Sierra and has the highest concentration of rare plants on the Plumas National Forest. The majority of Red Hill experienced moderate severity fire during the Dixie Fire. The Fales Basin proposed Special Interest Area may be located within the project area. This area experienced high severity fire and the population of California pitcher plant (*Darlingtonia californica*) remains but was significantly reduced in size. **While not listed on the R5 Regional Forester's Sensitive Species List (SSL) special consideration for populations of California pitcher plant should be included in this plan, including monitoring of populations as part of pre-implementation surveys.** Mechanical thinning within SIAs should be minimized as the

use of heavy equipment compacts soils and spreads invasive plant species. **Conservation organizations recommend that the PNF develop fuels reduction treatments and recovery plans specific to each SIA to reflect the needs of each SIA's unique botanical diversity. CNPS staff and members possess a comprehensive knowledge of California's flora and have training and experience related to the development of fuels reduction treatments and would be happy to respond to requests for recommendations or feedback regarding desired conditions or design features for a certain species or SIA.**

#### 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), located within the project area, serves as a model for co-management on the Plumas National Forest. Lands tended within the Maidu Stewardship Project fared better during the 2021 Dixie Fire than adjacent Forest Service lands surrounding Greenville, CA. Another example of Indigenous co-stewardship 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 groups 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 appreciates that the NFFR Project recognizes Cultural Stewardship lands. Members of the Mountain Maidu community have informed FoPW board and staff members that there is an interest in co-management of Indian Head (Keddie Peak). The area is of utmost cultural significance as it is the "center of the universe" of the Mountain Maidu. FoPW recommends expanding the Cultural Stewardship lands to include Indian Head and/or designating the area as a Special Interest Area to complement the Homer/Deerheart Lake SIA on the Lassen National Forest.**

#### Mature and Old-growth Forests

FoPW reviewers of the NFFRP PAPAN 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 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.

**FoPW recommends that the NFFRP EA include a map of mature and old-growth forests (as the Forest Service was mandated to do under E.O. 14072) and demonstrate how proposed vegetation treatments and post-fire fuels reduction treatments improve forest resiliency for these unique stands in the face of climate change.**

### **Special Status Plant Species**

The EA evaluated species listed under the federal Endangered Species Act (ESA) and those on the R5 SSL. While many of the most imperiled species are covered by the ESA and the 2014 update to the R5 SSL made this list much more comprehensive there are several species considered to be rare in California, listed in the CNPS Rare Plant Inventory (RPI) that were not considered for impacts. The Forest Service is required by CEQ regulations “to consider state requirements imposed for environmental protection to determine whether the action will have a significant impact”. *Sierra Club v. U.S. Forest Serv.*, 843 F.2d 1190, 1194 (9th Cir. 1988). 40 C.F.R. 1508.27(b)(10). For the purposes of the California Environmental Quality Act (CEQA) Cal. Code Regs. tit. 14 § 15065(a) requires that where a project threatens to “substantially reduce the number or restrict the range of an endangered, rare or threatened species”, the lead agency must prepare an EIR and implement feasible mitigation measures to avoid the net loss. Cal. Code Regs. tit. 14 § 15380(d) states that a species need not be listed to be considered “endangered” or “rare”. If information suggests that “its survival and reproduction in the wild are in immediate jeopardy from one or more causes” or “the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens”, it will be considered endangered or rare for the purposes § 15065(a). Under the California Environmental Quality Act (CEQA), plant species listed with a California Rare Plant Rank (CRPR) of 1 or 2 under the CNPS RPI should be evaluated for impacts, and CRPR 3 and 4 species should be considered in analysis of impacts if they meet the rarity criteria laid out in CEQA § 15380.

### **Trails**

FoPW supports the restoration and development of recreation facilities which allow public access to our Forest Service lands, if they do not have considerable impact on other public land values. Proposed trails should be sustainably designed and built to minimize erosion and located to minimize impacts to ecological and cultural resources. If trails are proposed within areas with special land designations they should not adversely affect the values the area has been recognized for. For example, if trails are constructed within Research Natural Areas, Special Interest Areas, or proposed Special Interest Areas they should not adversely impact the ecological values or research potential of these areas. Likewise, motorized trails should not bisect the few remaining intact roadless areas on the Plumas National Forest, such as

Inventoried Roadless Areas identified by the Forest Service or Citizen Inventoried Roadless Areas identified by The Wilderness Society. FoPW can provide appropriate PNF and SI staff with maps of areas with special designations. Alignment of the proposed motorized route on Mt. Jura should be realigned to minimize encroachment into the 19,140 acre Mount Jura CIRA.

**As stated above, a portion of the 11-mile motorized trail shown on the Mt. Jura Area Proposed Trails Map A-11 (p. 133) encroaches within the 19,140 Mount Jura Citizen Inventoried Roadless Area.**

The development of motorized trails within Genesee Valley may not comply with requirements outlined in the [Genesee Valley Special Management Area](#) of the [Plumas County 2035 General Plan](#) which states: “...off-road recreational use shall be limited to non-motor vehicle, except wheelchairs, uses such as hiking, camping, bicycling, horseback riding, or packing with animals. Recreational use shall be integrated with the Area Historic Roads and Trails, as well as new trails.” Historic Roads & Trails of educational and cultural value identified in the Genesee Special Management Area include the Mt. Jura Trail. On page 14 of the Genesee Valley SMA document the two goals for trails are: “1. To improve and enjoy the recreational potential of the Plumas National Forest and Genesee Valley, and to encourage the development of non-intensive, dispersed recreational uses. 2. To facilitate non-motorized trail access to achieve that end.” **FoPW demands that trails proposed in the NFFR EA comply with the Plumas County General Plan. Furthermore, if motorized trails are proposed within the Genesee Valley watershed the NFFR Final EA should analyze the impacts of noise on the Genesee Valley Special Management Area.**

#### Fire Management Features

At the October 19, 2023 North Fork Forest Recovery Project scoping meeting, Plumas National Forest staff presented a map showing locations where the PNF proposes to maintain permanent bulldozer lines. FoPW understands the need for retaining permanent fuel breaks along ridgelines to interrupt the continuity of fuels, provide anchors for prescribed fire and allow for rapid wildfire response. The Forest Service suppression repair practice of putting disturbed materials (fallen trees, stumps, and rocks) along the entire length of dozer lines increases fuel loading along ridges and impedes fire suppression efforts.

It is our understanding that the Plumas National Forest proposed “permanent dozer lines” will be open to Off Highway Vehicle use. FoPW is adamantly opposed to adding routes to the PNF Motor Vehicle Use Map without substantial public input and vetting. Development of the Plumas National Forest MVUM was extremely contentious and involved litigation; making any changes to the MVUM should incorporate adequate opportunities for public input.

The Plumas National Forest is responsible for managing over 3,000 miles of roads, many of which are in poor condition. Adding routes to the Plumas National Forest road network without closing others is unsustainable.

FoPW supports changes in how the PNF manages the 2,600+ miles of dozer line constructed during the Dixie Fire. Rather than treat these areas as permanent bulldozer lines/roads/OHV trails we strongly recommend these areas be managed as shaded fuel breaks which are gated to allow for administrative access only.

**Friends of Plumas Wilderness and our conservation allies are adamantly opposed to opening permanent Fire Management Features to public OHV use without meeting Travel Management Planning Minimization Criteria requirements.**

While ridgelines and rock outcrops are opportunistic locations for permanent fuel breaks, the exposed rock along ridgelines weathers into soils with chemical and/or physical properties that make them unsuitable for many common plant species. Edaphic endemic plants have evolved adaptations to thrive on these unique soil types and many rare plant species rely on these habitats that are inhospitable to other species. The use of heavy machinery in the construction and maintenance of ridgeline fuel breaks needs to be carefully planned to avoid impacts to special status species and habitat or introduction of invasive species. Locations considered for fuel breaks and permanent fire control lines should be surveyed for special-status plant species, including CRPR taxa, CESA listed species, and all watchlist species, in addition to federally listed or proposed threatened or endangered species and US Forest Service sensitive plant, lichen, and fungi species to ensure that these resources are preserved. While California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) records in the project area are not comprehensive a desktop review of CNDDDB, internal USFS data, herbarium records, and even iNaturalist could provide a preliminary list of locations to avoid placing fuel breaks and fire control lines pending more comprehensive surveys. Development of permanent fuel breaks on ridgelines and rock outcrops may be in direct conflict with Design Feature Botany-7. We are also especially concerned with impacts of activities in these areas during active fire suppression and information regarding sensitive resources in these areas should also be shared with the natural resource specialist to help avoid impacts to known special status plant populations during fire suppression activities.

Friends of Plumas Wilderness and our conservation allies have in-depth knowledge of a diverse array of topics pertinent to the North Fork Forest Recovery Project. Our organizations have been instrumental in the identification and designation of several special areas within the project area. We have helped the Forest Service steward these unique lands, waters, and old-growth forests for a half century. We are hopeful that the recommendations voiced in this letter will be heard by the Forest Service and Sierra Institute and incorporated into the North Fork Forest Recovery Project final environmental document.

Sincerely,

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*Literature Cited*

Giant Sequoia National Monument Management Plan, Part 2

[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3797649.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3797649.pdf)