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Submitted by email:
comments-pacificsouthwest-modoc-big-valley@usda.gov

Big Valley Ranger Station
ATTN: Modoc West Plantation Fuels Reduction
PO Box 159
Adin, CA 96006

To Whom It May Concern:

The Lassen County Board of Supervisors is in full support of the Modoc West Plantation Fuels Reduction project, Modoc National Forest. This is an important project for forest health and during a time when it is well known that the Forest Service is struggling to deliver fuel treatments, manage resources, and firefighting resources are limited or not available.

National Forest System lands have transitioned from productive forestlands to firehedges where even the smallest of wildfires feed on hazardous fuels conditions. Fires throughout California have grown into catastrophic wildfires that have threatened and destroyed communities. It is often said at all levels of government and industry that the condition of our nation's forests is overstocked and more must be done to thin vegetation and dead and dying trees (including thousands of square miles of post-wildfire burned trees in California). It is well publicized that the Forest Service does not have the staffing to monitor fires and fires that have been 'monitored' have not been actively suppressed and led to major incidents. Property and lives have been tragically lost. There are hundreds of examples of wildfires that have caused billions of dollars in capital losses including damage to critical infrastructure, homes and businesses, deterioration of air quality, crops and livestock, resources, and lives. Recent fires in an around Lassen County include the Dixie Fire, Sheep Fire, Gold Fire, Hog Fire, Roxie Fire, Whaleback Fire, to name a few. In 2021, the Dixie Fire of almost 1 million acres, impacted Butte, Plumas, Shasta, Lassen and Tehama Counties, and was the most expensive wildfire in terms of suppression efforts in United States history.

Attached to this letter is a statement of Randy Moore, Chief of the USDA Forest Service Before the United State Committee on Energy and Natural Resources Concerning President's Fiscal Year 2024 Proposed Budget for the USDA Forest Service of April 18, 2023. His letter highlights the need and urgency for the Forest Service to restore forest health and resiliency and reduce the risk of catastrophic wildfires to communities. He said that confronting the wildfire crisis is "The Forest Service's paramount focus to be combatting the threat and impact of destructive wildfire to our nation's communities, critical infrastructure, forests, rangelands, water supplies, and wildlife."

It is our understanding of this project that 30,000 acres of National Forest System Plantations are proposed for treatment. These are plantations that for the most part have never been treated since planting in the 1970's!, 80's!, and 90's! Some plantation conditions are overgrown and thought to be in remarkable good condition despite overcrowding, however, the number of stems per acre is a multiple of that envisioned for a healthy forest. It is vitally necessary that a treatment by thinning and/or mastication begin immediately; this would result in stands that are in a much more natural state and likely to withstand wildfire. Returning stands to a natural state would create beneficial affects benefiting water and wildlife resources, and more importantly, not be a threat to resources or nearby communities and private holdings. If the proposed project is not approved and work expedited, the conditions of the project area will continue to be overgrown and an unmanaged, hazardous fuels conditions, to nearby communities and resources. We ask that this project be expedited to approval and implementation this year, 2023, as soon as possible by the Forest Service.

We would support the intensity of thinning to be greater along roadways where a large percentage of fires start. We would also support efforts by the Forest Service to increase thinning intensity and width of thinning along National Forest Roads, especially ML 5-4-3 for passenger cars and ML 2 for high-clearance vehicles. Please also consider additional thinning on National Forest System lands that are adjacent to state or county right-of-way areas or roads that bisect plantations, motorized mixed use roadways, access roads that lead to campgrounds, private land holdings, or places that people gather. Thinning intensity can be a safety hazard to emergency personnel if too few trees are removed thereby creating hazardous conditions during emergency situations. It is imperative that thinning treatments prioritize reducing surface fuels and the probability of crown fires in dry forest conditions, especially along roadways that could be used as evacuation routes for evacuating visitors to the forest or for retreating emergency personnel during extreme fire behavior.

The Forest Service should consider expanding thinning everywhere in the plantation, as necessary, noting that that these plantations are a significant public investment in the future and their current overgrown status puts them at great risk for fueling catastrophic wildfire and generate and exacerbate insect infestations such as the Pine Bark Beetle which devastated overgrown plantations and native pine forests.

In addition to the project, outside of plantations, where only merchantable trees were previously harvested, small trees (non-commercial) were ignored for decades. Now there are way too many small, non-economic trees. We urge the Forest Service to initiate thinning and fuels reduction treatments throughout those areas to meaningfully reduce risk to communities, and create healthier and more fire-resilient public lands.

Please accept this letter of support as one of highest regard for this project.

Sincerely, 

GARY BRIDGES, Chairman
Lassen County Board of Supervisors

**Statement of Randy Moore, Chief of the USDA Forest Service
Before the United States Senate Committee on Energy and Natural Resources
Concerning President's Fiscal Year 2024 Proposed Budget
For the USDA Forest Service
April 18, 2023 10:00 a.m.**

Chair Manchin, Ranking Member Barrasso, and members of the Committee, thank you for inviting me here today to testify on the President's fiscal year (FY) 2024 Budget request for the U.S. Department of Agriculture (USDA), Forest Service.

The fiscal year 2024 President's Budget for the USDA Forest Service discretionary appropriations totals \$7.4 billion for base programs and \$2.3 billion for the wildfire suppression cap adjustment (in the Wildfire Suppression Operations Reserve Fund). The fiscal year 2024 request focuses on three primary areas: modernizing the wildland fire management system; confronting the wildfire crisis; and ensuring equitable access to and benefits from the National Forest System.

The investments highlighted below reflect services the Forest Service delivers through work on National Forests, partnerships with State, Private, and Tribal landowners, and our Research and Development mission area. These investments enable the Forest Service to restore long-term forest health and resiliency across landscapes the American people rely-on while ensuring equitable access to the resources on National Forest lands. Alongside our partners, the Forest Service will continue to reduce the risk of catastrophic wildfires to communities in FY 2024 through investments in the highest priority landscapes identified within the Wildfire Crisis Strategy. The Forest Service will maximize every dollar invested into our agency, making every dollar work for the American people. The people we serve deserve nothing less than to see the value of their money at work for their benefit.

The President's FY 2024 Budget Request for Specific Priorities to Support Focal Areas

The following investments align with and enhance the agency's efforts to modernize the wildland fire management system:

- **\$1.4 billion for Wildland Fire Management Salaries and Expenses:** Investing in our wildland firefighting workforce is a matter of national security as critical infrastructure, homes, communities, structures, and natural resources are at grave and growing risk of catastrophic wildfire. The FY 2024 budget funds a permanent increase in pay for the wildland firefighter workforce, providing a more livable wage, enhancing recruitment, and supporting retention. Specifically, this request includes:
 - \$180 million for increasing base pay for federal wildland firefighters to ensure that this crucial workforce does not face a pay cliff at the end of this year
 - \$69 million to support cost of living increases for FY 2024
 - \$259 million for increasing federal firefighting capacity (an estimated 970 additional federal firefighters and personnel) to expand our ability to address the wildfire crisis and reduce the strain on our current workforce

- \$10 million for vital health and well-being assistance to more comprehensively support our wildfire firefighter workforce;
- \$50 million to address the urgent need for wildland firefighter housing through necessary maintenance and repairs of Forest Service housing units that will support our recruitment, hiring, and retention efforts.
- **\$323 million for Hazardous Fuels Reduction:** To mitigate wildfire risk on 4.2 million acres in high priority and high-risk firesheds, building on hazardous fuels funding from the Bipartisan Infrastructure Law and Inflation Reduction Act and aligned with the agency's 10-Year Wildfire Crisis Strategy.

The following investments ensure that national forests and grasslands continue to provide experiences, services, and products to the American public by focusing on the restoration, enhancement, and resilience of the Nation's forests and grasslands:

- **\$56 million for the Burned Area Rehabilitation:** to build on capacity created with the \$65 million per year seed money from the Bipartisan Infrastructure Law to rehabilitate burned areas and free up existing funding for more proactive forest health work.
- **\$94 million for Recreation, Heritage, and Wilderness:** to increase support of critical recreation operations, planning, services, and improvements, with particular emphasis on creating welcoming, sustainable, and equitable recreation opportunities for all Americans with a focus towards underserved and Tribal communities.
- **\$50.5 million for Vegetation and Watershed Management:** to support healthy and resilient watersheds and landscapes, sustain the production of clean and abundant air and water, assist with meeting the Administration's climate goals, and contribute to healthy and productive communities and Tribal Nations.
- **\$45 million for Minerals and Geology Management:** to locate and prioritize orphaned oil and gas wells for remediation and the inventory, environmental analysis, and clean-up of mine reclamation sites.
- **\$7.8 million for Grazing Management:** to support post-fire restoration, provide for strategic incentives to grazing permittees, and build vibrant rural economies.
- **\$55 million for Forest Health Management:** to ensure healthy forests and functional landscapes on federal and non-federal lands in support of the conservation priorities of the Administration.
- **\$80 million for Collaborative Forest Landscape Restoration Program:** to invest in communities and regions with a collaborative, common purpose in reducing wildfire risk and improving forest health and resiliency.
- **\$1.7 billion for National Forest System Salaries and Expenses:** to support the agency's 10-Year Wildfire Crisis Strategy as well as critical non-fire programs, which have decreased in funding over time as wildland fire response needs escalated.

Further investments ensure that the Forest Service relies on the latest science and technology to deliver results on the ground and for the people:

- **\$502 million for Information Technology Capabilities:** to continue

modernization of our Information Technology systems that allow the public to better access our services, sustain emergency communication systems, and provide our workforce the tools they need to carry out our conservation mission safely and efficiently.

- **\$72 million for Zero Emissions Vehicles:** included across several program funding requests to invest in replacing vehicles within the agency fleet and to provide for employees and visitors with charging infrastructure.
- **\$349 million for Forest and Rangeland Research:** to continue investments in research priorities, with a focus on climate change-related research including reforestation, carbon accounting, and fire and fuels research.
- **\$6 million for USDA Climate Hubs:** to accelerate science production and technology transfer that will aid management agencies, private landowners, and agricultural producers adopt scientifically sound climate adaptation practices.

Confronting the Wildfire Crisis

The Forest Service's paramount focus continues to be combatting the threat and impact of destructive wildfire to our nation's communities, critical infrastructure, forests, rangelands, water supplies, and wildlife. Changing environmental conditions have lengthened fire seasons into fire years and worsened wildfires across the West. Expanding development into the wildland/urban interface (WUI) increasingly puts more homes into fire-prone landscapes and increases the challenge and complexity of wildfire suppression and fuels reduction work. Most wildfires that cause significant damage to a large number of homes and other structures are human caused; 97% of wildfires threaten homes; and almost one-third of American homes are within the WUI.

The Forest Service has a historic opportunity now, between the investments from the Bipartisan Infrastructure Law, the Inflation Reduction Act, and our annual appropriations, to implement solutions at a large scale. We are now entering our second year of carrying out our 10-Year Wildfire Crisis Strategy. The Wildfire Crisis Strategy aims to increase science-based fuels treatments by up to four times previous treatment levels, especially in those areas at highest risk. By working in the right places at the right scale, our treatments can reduce wildfire risk and better protect communities, infrastructure, and natural resources while helping wildland firefighters respond to wildfires safely and effectively.

The Forest Service cannot succeed in this alone. The highest risk firesheds are typically in multiple land ownerships. The Forest Service will continue to strengthen our long-standing work and relationships with Tribes, States, local communities, private landowners, and other stakeholders to adapt lessons learned into a coordinated and effective program of work as outlined in the 10-Year Wildfire Crisis Strategy. Through government-to-government consultation with Tribes, expanded partnerships and co-stewardship, and broader community support, the Forest Service will increase the use of prescribed fire, fuel treatments, and the management of unplanned ignitions to reduce long-term wildfire risks. Fortunately, we have decades of experience working through collaborative partnerships based on common values and shared goals across shared landscapes as set out in the National Cohesive Wildland Fire

Management Strategy.

Ensuring Equitable Access to and Benefits from the National Forest System

The Forest Service will continue to invest in actions that create broad and efficient access to the vital resources our forests and grasslands provide. This effort is twofold. First, we must ensure that those who rely on these services and benefits can access those benefits safely. Therefore, we are committed to improving the operation and maintenance of our extensive infrastructure portfolio that includes buildings, dams, communication sites, recreation sites, roads, trails, and bridges. Second, to carry out this work effectively, the Forest Service is committed to continued intentional internal and external engagement with Tribal Nations whose ancestral homelands are within or adjacent to federally managed public lands, and communities that live by, visit, and depend on national forests. The Forest Service is committed to identifying and removing barriers to access Forest Service programs and services for historically underserved communities. This will be done by integrating equity-centered criteria in the design, funding, and prioritization of all policies, programs, and activities to center equity considerations as part of the decision process. The Forest Service will also work to advance mission critical work, remove barriers and boost economic opportunities through improved access to contracts, grants and agreements, and permits.

Leveraging Additional Funding Authorities

Along with the tools and investments proposed in the FY 2024 Presidents Budget, the Forest Service will leverage funding within the Bipartisan Infrastructure Law (BIL) and the Inflation Reduction Act (IRA) to confront the wildfire crisis, create new markets and technology for wood products, promote economic development, and restore forest health and resiliency through partnerships and collaboration across landscapes.

Through the Bipartisan Infrastructure Law (BIL), Congress provided a \$1.4 billion down payment that greatly assists in putting our Wildfire Crisis Strategy into action with investments on ten landscapes in eight Western States (Arizona, California, Colorado, Idaho, Montana, New Mexico, Oregon, and Washington). Through work on these landscapes and others, we completed treatments on 3.2 million acres nationally in 2022. We also accomplished these treatments in 118 of the 250 high-risk fireheds identified in the Wildfire Crisis Strategy. This work was accomplished despite numerous challenges including workforce capacity and high post-fire workloads from historic wildfire activity across the country the past several years. The work on these acres directly reduced risk to communities, infrastructure, and critical watersheds.

The Inflation Reduction Act provides the Forest Service an additional \$1.8 billion for hazardous fuels funding in the WUI. With IRA funding, we recently selected 11 additional landscapes for treatment in seven Western States (Arizona, California, Idaho, Nevada, Oregon, Utah, and Washington). Combined with the initial BIL investment landscapes, our actions will span nearly 45 million acres across 134 of the 250 high-risk fireheds in the western U.S., with a total investment to date of \$930 million on 21 landscapes in 2023. These investments will help reduce the risk of wildfire to at-risk communities, Tribal lands, critical infrastructure, utility corridors, and public water sources. We listened to our partners, the public we serve, Tribes and many others regarding what mattered most to them, where opportunity is, and where

challenges remain. Their feedback and our experience on these landscapes helped us identify both challenges to implementation and enabling conditions for future success.

Through Great American Outdoors Act (GAOA) (P.L. 116-152) funding for the National Parks and Public Land Legacy Restoration Fund, the Forest Service continues to repair and upgrade vital infrastructure and facilities in the national forests and grasslands. The GAOA also permanently funds the Land and Water Conservation Fund (LWCF), with which the Forest Service invests in conservation and recreation opportunities in public and private lands through the Forest Legacy Program and Federal Land Acquisition.

Forest Service projects will support about 3,500 jobs and contribute \$350 million to the GDP on an average annual basis over the 5-year authorization of the GAOA National Parks and Public Land Legacy Restoration Fund. In FY 2024, the Forest Service proposes \$94.3 million for the Forest Legacy Program, \$123.9 million for Federal Land Acquisition, and \$285 million for the National Parks and Public Land Legacy Restoration Fund. The FY 2024 project lists are included in the FY 2024 Budget request.

In closing, the President's FY 2024 Budget request for the Forest Service proposes a landmark investment in wildland fire, establishes funding priorities for risk-based wildfire reduction, and improves overall access and utilization of our National Forests System. The FY 2024 Budget request underscores our commitment to long-overdue investments in our wildland firefighter workforce to provide them with the compensation that they deserve, along with critical investments to support health and wellbeing, and expanded options for housing. The FY 2024 Budget also highlights the importance of restoring and creating resilient landscapes, improving infrastructure, and removing barriers to access. We look forward to working with this Subcommittee to fulfill the President's goals and our key responsibilities for the long-term benefit of the Nation's forests and grasslands, and for all Americans. I will be glad to answer your questions.



DEAR Interested Citizens, Stakeholders, and Partners:
The Forest Service is seeking comments on the **Modoc West Plantation Fuels Reduction Project** (Project). This scoping package provides information related to the proposed action, the scoping process, and how to submit comments.

1 Introduction

The Project is a collaborative partnership between Golden State Natural Resources (GSNR) and the Modoc National Forest (MDF). Golden State Natural Resources is a nonprofit organization founded by California local governments to help improve forest health by removing excess fuels from forests, to provide natural services and avert such large, destructive wildfires as have become increasingly common in recent years.

The first stage of the Project will gather data for conifer tree plantations located in the Big Valley and Doublehead Ranger Districts (see Figure 1). The second stage of the project will use these data to select and prioritize some of these plantations for fuel reduction treatments (see Figures 2 and 3). The third and final stage of the project would be implementation of thinning and fuel reduction treatments in the selected plantations.

2 Project Area

The conifer plantations from which the treatment units will be selected are approximately 31,996 acres within Lassen, Modoc, and Siskiyou Counties in California. Please see Appendix A for detailed public land survey system location descriptions.

3 Law, Regulation, and Other Direction

The Project would be designed to meet Forest-wide standards and guidelines consistent with the 1991 *Modoc National Forest Land and Resource Management Plan* (MDF LRMP) as amended by the 1994 *Northwest Forest Plan Amendment* (NWFP) in the Medicine Lake area, and the 2004 *Sierra Nevada Forest Plan Amendment* (SNFPA) as amended by the 2007 *Sierra Nevada Forests Management Indicator Species Amendment* which covers the rest of the Doublehead and Big Valley Ranger Districts, excepting the Big Valley Federal Sustained Yield Unit.



Modoc West Plantation Fuel Reduction Project

SCOPING LETTER

Thinning and fuel reduction activities may be categorically excluded from documentation in an Environmental Impact Statement (EIS) or an Environmental Assessment (EA) under **36 CFR 220.6(e)(6)**. Example ii specifies “Thinning or brush control to improve growth or to reduce fire hazard including the opening of an existing road to a dense timber stand” as an example of appropriate use of this category. I have directed that this Project be designed to conform to the requirements of this CE.

4 Purpose and Need

The purpose of the Project is to manage fire within plantation areas and contribute to sustainable, resilient vegetation structure for protection of human communities and other high-value resources. Fuel treatments are part of preparedness planning and are critical to ensure that imminent fire situations are recognized, and risk of catastrophic wildfire is reduced. The conifer plantations dispersed across the 31,996-acre project area are investments at risk to loss from high fire severity. Many of these conifer plantations are within Condition Class 2 in Fire Regime Groups I and III (as defined by LANDFIRE, an interagency Landscape Fire and Resource Management Planning tool), meaning that they are overstocked and have high fuel loads.

There is, therefore, a need to decrease flame lengths, slow fire spread, and decrease potential for extreme fire behavior by reducing ladder fuels and high fuel-loading. Given the purpose and need, I have determined five goals for this project:

1. Reduce the risk to public safety of catastrophic wildfire;
2. Improve the resilience of timber plantations to wildfire, insect pathogens, and disease by increasing the distance between tree crowns;
3. Utilize prescribed fire as a management tool to maintain desired conditions within plantations and across the landscape;
4. Improve the growth and vigor of remaining trees by reducing stocking levels; and
5. Make forest products available to support local communities.

5 Proposed Actions

To respond to these needs and fulfill our purposes, the MDF, in partnership with GSNR, proposes the following actions to reduce the risk of catastrophic wildfire, protect the investment the Forest Service has made in its plantations, and make forest products available to support local communities. In close coordination with the MDF, GSNR foresters and forest fire specialists would implement a range of thinning and fuel reduction methods based on assessed site conditions.



OVERVIEW OF THINNING AND FUEL REDUCTION ACTIVITIES

Following visual inspections, GSNR's foresters would recommend silvicultural prescriptions to the MDF. The MDF would review GSNR recommendations for consistency with Forest Plan goals and objectives for forest health. A range of thinning and fuel reduction methods would be utilized depending on site conditions, such as tree size and density, vegetation type, slope, accessibility. These fuel reduction methods include mechanical thinning, mastication, and prescribed fire. New low standard road construction will be utilized when existing access is inadequate, up to 1 mile as allowed under 36 CFR 220.6(e)(6).

(a) **Thinning** Silvicultural prescriptions would target trees up to 20 inches diameter at breast height (DBH) and biomass including brush higher than 12 inches above the ground, with the goal of spacing trees 17 to 35 feet apart. Freshly cut stumps greater than 14 inches DBH would be treated with Cellu-Treat, a borax-based fungicide, to prevent the establishment of *Heterobasidion* root disease.

(b) **Mechanical Thinning** Variable density thinning would be the proposed method for mechanical thinning. Equipment used to conduct mechanical thinning would include wheeled or tracked forestry equipment and would be selected based on field reconnaissance.

(c) **Mastication** Mastication treatment can utilize several different types of equipment to grind, chip, or break apart fuels such as brush, small trees and slash into small pieces. Masticating fuels decreases the potential for catastrophic wildfires by reducing ladder fuels and creating a gap between surface fuels and crown fuels.

(d) **Prescribed Fire** Prescribed fire would be used as a management tool to treat resprouting brush and maintain surface fuel loading at desired levels.

6 Scoping Process

The participation of interested and affected American citizens is important at numerous points during project planning and analysis. The Forest Service seeks to develop this project through a collaborative process that includes multiple interested parties or persons representing diverse interests. The scoping intent is to share our initial proposal and seek information, comments, and assistance from federal, state, and local agencies and individuals or organizations that may be interested in or affected by the proposed action.

Please submit your input and comments by June 19, 2023. Although you may submit comments at any point during the planning process, input received prior to this date will be most useful for us to consider your comments and suggestions during project planning and analysis.



Modoc West Plantation Fuel Reduction Project

SCOPING LETTER

HOW TO COMMENT

Please submit comments via the project webpage at:

<https://www.fs.usda.gov/project/?project=64016>

On the right-hand side of the webpage, under the "Get Connected" box, click "Comment on Project", and fill out the web form to submit your comment.

Comments may also be mailed or hand-delivered to:

Big Valley Ranger Station
ATTN: Modoc West Plantation Fuels Reduction
PO Box 159
Adin, CA 96006

Comments may also be e-mailed to:

comments-pacificsouthwest-modoc-big-valley@usda.gov.

Please put: "ATTN: Modoc West Plantation Fuels Reduction" in the subject line.

Names and addresses of those who comment will be considered part of the public record on this proposed action and will be available for public inspection.

I appreciate your interest in this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Milton Stubbs".

Digitally signed by MILTON
STUBBS

Date: 2023.05.16.15:47:50 -07'00'.

MILTON STUBBS

District Ranger