

CONSIDERATION OF COMMENTS FOR COMMUNITY PROTECTION – CENTRAL AND WEST SLOPE PROJECT

COMMENT PERIOD

The comment period for the Community Protection – Central and West Slope Project started on 6/19/2023. The Responsible Official requested comments back within 30 calendar days. While comments may be submitted at any time, for the purposes of this comment period, comments were accepted through 7/20/2023. Two comment letters were received following the close of the comment period. Those comments have been considered and are included in this document.

PARTIES RESPONDING TO THE COMMENT PERIOD

Table 1 Responding Parties

Name	Comment Letter No	Project File Document Name
EPA	A1	A1_EPA PNF Letter
University of California Cooperative Extension	A2	A2_2023_0719 Tompkins Ryan_UCCE
Sierra Forest Legacy	I1	I1_2023_0719 Britting Sue SFL
Plumas County Forest Safe Council	I2	I2_2023_0719 Hepner Hannah PCFSC
Friends of Plumas Wilderness	I3	I3_2023_0718 Schrammel Charles FoPW
American Forest Resource Council	I4	I4_2023_0719 Blaufuss Jake AFRC
California Native Plant Society	I5	I5_2023_0623 Jensen Nick CNPS
Pacific Crest Trail Association	I6	I6_2023_0710 Swift Connor PCTA
John Muir Project	I7	I7_2023_0719 Hanson Chad JMP
Plumas Forest Project	I8	I8_2023_0719 Preschutti John PFP 1.pdf
Plumas Forest Project	I9	I9_2023_0719 Preschutti John PFP 2.pdf
Josh Hart	I10	2023_0719 Hart Josh FAN
Graham Wright	I11	I11_2023_0617 Wright Graham Email I11_2023_0719 Ryan Bauer Response_Wright Graham Email
David Valle	I12	I12_2023_0625 Valle David Email
Virginia Vasquez	I13	I13_2023_0627 Jaquez Virginia Email
Marc Coventry	I14	I14_2023_0710 Coventry Marc Email
Brad Marston	I15	I15_2023_0711 Marston Brad Email
Nick Collin	I16	I16_2023_0712 Collin Nick Email

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Name	Comment Letter No	Project File Document Name
Mary Douma	I17	I17_2023_0712 Douma Mary Email
Melissa Hays	I18	I18_2023_0712 Hays Melissa Email
Derek Lerch	I19	I19_2023_0712 Lerch Derek Email
Wolfgang Rougle	I20	I20_2023_0712 Rougle Wolfgang
TJ Scruggs	I21	I21_2023_0712 Scruggs TJ Email
Lorna Moffat	I22	I22_2023_0713 Moffat Lorna Email
Mike Callaghan	I23	I23_2023_0714 Callaghan Mike Email
Gene Nielsen	I24	I24_2023_0714 Nielsen Gene Email
David Arsenault	I25	I25_2023_0716 Arsenault David Email
Mike McCourt	I26	I26_2023_0716 McCourt Mike Email
Staci Baker	I27	I27_2023_0718 Baker Staci Email
Gary Darling	I28	I28_2023_0718 Darling Gary Email
Rose Comstock	I29	I29_2023_0719 Comstock Rose
Cinnamon Cruz	I30	I30_2023_0719 Cruz Cinnamon Email
Maya Khosla	I31	I31_2023_0719 Khosla Maya Email
Asher Perla	I32	I32_2023_0719 Perla Asher Email
Gail Slaavik	I33	I33_2023_0719 Slavik Gail Email
Craig Swolgaard	I34	I34_2023_0719 Swolgaard Craig Email
Nina Beety	I35	I35_2023_0719 Beety Nina
Tonja Chi	I36	I36_2023_0720 Chi Tonja
Western Native Tree Society	I37	I37_WNTS Comment Letter on I37_Community Protection _ Central & West Slope Project
Heidi Hart	I38	2023_0719 Hart Heidi
John O'Brien	I39	2023_0719 Obrien John

COMMENT ANALYSIS & RESPONSE

Comments were reviewed by the interdisciplinary team (ID team) to determine if issues or concerns were raised that demonstrated a clear cause-effect relationship and if recommendations/remedies were suggested that would address the issue/concern. Issues raised by multiple parties are listed once. If comments were supportive in nature and provided no issues/concerns or recommendations, they are not analyzed further in this document but are included in the project record.

Table 2 Comment Analysis & Response

Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Air Quality			
Current conditions/general conformity (A1-4)	Correcting attainment status and adding clarification about 40 CFR 93.153	Factual corrections made	Section 3.6, “Air Quality and Climate Change” was revised to include additional detail on the current attainment status and add the recommended clarification regarding 40 CFR 93.153. However, only current attainment status is presented, and historic status provided in the comment are not included because they do not reflect the existing affected environment.
Pile burning (A1-5)	Air curtain burners suggested	Comment considered but no changes needed	Air curtain burners can be an effective tool to reduce emissions, however they are not feasible for this project due to its remote location and size.
Design features (A1-6)	Additional BMP to reduce smoke and emissions	Other - See Remarks	Several suggested measures were added, such as new Design Features AQ-4 and AQ-5 to reduce air pollutant emissions. Measures that would limit the pool of potential contractors (such as limits on equipment ages or fuel types) have not been included because they would reduce the pool of potential implementers potentially making implementation of the Project infeasible.
Gasification (I28-1; I28-3; I28-4)	Gasification would be beneficial to ensure sustainability and would be a tool for the utilization of burned and unburned forest biomass is a forward-thinking and sustainable solution.	Comment considered but no changes needed	Gasification is a useful tool at the appropriate scale; however, the Project size, remoteness, and current gasification technology are all limiting factors that limit the feasibility of such a system for the Project.
Human Health (I30-6)	Prescribed burns also have significant health impacts and productivity impacts on the community. Government has ways to mitigate smoke, but these were not addressed in the most recent prescribed burn.	Comment considered but no changes needed	Air quality impacts from prescribed burning are evaluated in Chapter 3, Section 3.6, "Air Quality and Climate Change," of the Draft EA (pgs. 3.6-8—3.6-13)

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Best Available Science			
Climate/Wildfire Behavior/Forest Health (I38-2)	Best available science on climate, wildfire behavior, and forest health	Comment considered but no changes needed	The EA utilizes best available science for climate, fire behavior, and forest health and resilience.
Bernal et al. 2022 (A2-3)	Please consider including the findings of Bernal et al. 2022 in the EA	Literature/science considered and Analysis supplemented, improved, or modified	Bernal et al. 2022 was reviewed and incorporated into the EA by reference. Bernal et al. 2022 further analyzes the concepts of North et al. 2022 with more of a climate change focus. Essentially, the authors determine that in fire-prone forests such as the Protect Project area, historical forest conditions varied with climate and moisture availability. As climate is predicted to get hotter with more variable precipitation, conditions will most likely favor low tree densities, low biomass, and high pine dominance. The analysis timeframe for the paper looks at the years 2040 to 2069. This paper is pertinent in that it further justifies the Purpose and Need of the Project and how a Forest Plan amendment is necessary if the project is to reduce stand densities low enough to favor pine species to increase resiliency to large scale disturbances such as drought and wildfires. The Final EA has been supplemented with information from this
Wildlife Biology			
California Spotted Owl (A1-9-1)	Coordinate with USFWS for California spotted owl monitoring plan.	Comment considered but no changes needed	Currently CSO are listed as Proposed Threatened, therefore consultation with USFWS is not required for the species. Cumulative effects to sensitive wildlife species were discussed in the EA (page 3.2-15). Protocol-based surveys are being implemented prior to and during project layout to ensure appropriate prescriptions are being used in suitable and occupied CSO habitat. Post-implementation surveys may be completed, though these are not required and are not part of the proposed action. Coordination with USFWS is ongoing as the Service moves through the process to determine if the listing of the CSO is warranted. If CSO is listed, consultation with USFWS will occur and conservation measures recommended during the consultation process will be adhered to.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
California Spotted Owl (A1-9-2)	Describe how FS will accomplish spotted owl monitoring.	Comment considered but no changes needed	Monitoring for project efficacy will likely be based on the same analytics used in developing the project, flame length models and relative stand density measurements (EA, section 3.1.4) rather than direct monitoring of spotted owl populations. The project is expected to impact CSO habitat, however, the project aims to retain the most important CSO habitat while increasing forest resiliency across the landscape. Protocol based surveys will be completed during the project planning and layout process to ensure appropriate methods and prescriptions are being used and all territories (PACs and HRCAs) are protected following project design features. These surveys are being carried out by both FS and FS employed contractors. Post-implementation CSO surveys are not required or part of the proposed action.
California Spotted Owl (A1-9-3)	Describe if and how partnerships will be used in spotted owl monitoring efforts.	Comment considered but no changes needed	Partners level of involvement with CSO monitoring has not been planned or established. Contractors will be used to complete protocol surveys prior to implementation. Project specific post-implementation surveys may not be feasible due to funding and/or personnel constraints. Research data collected by FS and/or partners may be used to infer effects of project on spotted owls, though these may not be capable of isolating project effects versus weather or other environmental effects, long term impacts, or natural range of variation.
California Spotted Owl (A1-9-4)	Describe BMP and Design Feature “enforcement” monitoring for spotted owls.	Comment considered but no changes needed	Work will be completed through contracts, therefore, BMPs and Design Feature compliance will be completed through Contracting Officers Representatives (contracts), Timber Sale administrators and Harvest Inspectors (for timber sales) during project implementation. This is standard operating procedure for FS projects and is an accepted method of ensuring adherence to proposed actions and mitigations. Contracts typically contain dis-incentives for failure to follow specifications, and consequences for non-compliance. These contracts will more specifically describe inspections to be completed to ensure compliance. If BMPs or Design Features are not implemented correctly, it may increase potential for impacts. However, should this happen, it would likely impact a small portion of the project area and/or species range before being identified and addressed, and preventing similar non-compliance in other portions of the project area. However, project specifications, design features, and standards and guidelines must be relied upon to analyze for project effects, as they are part of the proposed action, and analyzing for effects if those mitigations were not implemented is not an accurate assessment of the expected impacts.

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California Spotted Owl (I1-15)	Impacts to CSO Not Adequately Disclosed - Requesting HRCA by HRCA analysis be added	Analysis supplemented, improved, or modified	An analysis of each individual HRCA was added to Appendix E (pgs. E8-1 – E8-9 and E8-16 – E8-21) and the Biological Section (pg. 3.2-22)
California Spotted Owl (I7-33)	Mechanical thinning has adverse effects on spotted owl habitat	Comment considered but no changes needed	The mission of the Forest Service is to sustain the health, diversity, and productivity of the Nation’s National Forests both now and into the future. Extensive recent research indicates that the current forest condition is unsustainable and presents an imminent threat to the viability of old forest-dependent species (North et al. 2022). As professional land managers, one of our goals for this project is to reduce tree stem density and fuel loads in alignment with the best available guiding research to create greater forest resiliency to catastrophic wildfire. Much of the current best-available-science indicates that the forest conditions promoted by the 2004 SNFPA are unsustainable under the current climate, and conserving dense forest conditions wherever they occur presents unacceptable levels of risk (Steel et al. 2023). The proposed actions in Alternatives 1 and 2 provide focused spotted owl habitat conservation in PACs and HRCAs beyond what is recommended in the CSO Conservation Strategy. This focused protection is combined with the more general conservation strategy of variable density thinning, which protects the largest trees in clumps and promotes the long-term development of a heterogenous forest structure. These combined conservation measures help sustain forest habitats on the landscape over the short-term as well as the long-term and as such are not expected to further degrade the level of existing viability.
California Spotted Owl and Northern Goshawk (I1-29)	Survey approach for Goshawks and CSO is not consistent with Forest Plan direction.	Comment considered but no changes needed	Resource surveys are ongoing and will be complete before implementation occurs.
Fisher (I1-33)	Request for site-specific treatment in fisher den buffer be proposed pre-treatment	Proposed action modified	Design Features in Appendix A of the Project EA (WLDF-3) have been updated to include language from SNFPA 2004 for treatments within fisher den sites: Avoid fuel treatments in fisher den sites outside the WUI; within the WUI limit treatments to mechanical clearing of fuels (piling or mastication, burning of piled debris is allowed). Maintain at least 60 percent canopy cover in fisher den sites. Maintain at least 4 large (>15” dbh) snags per acre, or 6 where hardwoods lack dead branches. The analysis in the EA was completed with these design features in mind.

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Late Seral Habitat (A2-6)	Criteria for Retaining Late Seral Habitat	Comment considered but no changes needed	North et al 2017 does not distinguish understory characteristics associated with stands in California spotted owl territories; the paper does identify dense canopy cover comprised of tall trees as an important component of CSO habitat, which is consistent with numerous other studies that demonstrate CSO select for stands in the larger size classes with dense canopy cover (Bias and Gutiérrez 1992, Blakesley et al. 2005, Blakey et al. 2019, Chatfield 2005, Jones et al. 2017, Moen and Gutiérrez 1997, North et al. 2000, Roberts et al. 2011, Seamans 2005, and others). While topographic position may be incorporated into site-specific prescriptions, limiting dense canopy cover to only drainages or other mesic sites, such as identified in North et al. 2022, would not maintain habitat currently being used by CSO. The CSO Conservation Strategy as well as North et al. 2017 both identify the retention of habitat currently being used by reproductive CSO pairs as a priority to maintain current populations while simultaneously increasing resiliency of unutilized habitat as well as the landscape at large to provide future habitat.
Late Seral Species Impacts (I31-14)	Does the Plumas National Forest have data indicating the long-term impacts of heavy forest thinning on spotted owls and northern goshawks? Needs to be shared with the public		The analysis assumes that the project will have impacts on California spotted owl and northern goshawk. Those expected impacts are disclosed in section 3.2 of the EA and are supported by the best available science. Citations for research related to the effects of forest management activities on the species can be found in the "Conservation Strategy for the California Spotted Owl in the Sierra Nevada, Version 1.0" Pages 11-12.

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Mature Forest Species (I1-11, I1-12, I1-13)	Alt 1 Will not Maintain Viable Populations of Sensitive Species Dependent of Mature Forest Habitats	Comment considered but no changes needed	The mission of the Forest Service is to sustain the health, diversity, and productivity of the Nation’s National Forests both now and into the future. Extensive recent research indicates that the current forest condition is unsustainable and presents an imminent threat to the viability of old forest-dependent species (North et al. 2022). As professional land managers, one of our goals for this project is to reduce tree stem density and fuel loads in alignment with the best available guiding research to create greater forest resiliency to catastrophic wildfire. Much of the current best-available-science indicates that the forest conditions promoted by the 2004 SNFPA are unsustainable under the current climate, and conserving dense forest conditions wherever they occur presents unacceptable levels of risk (Steel et al. 2023). The proposed actions in Alternatives 1 and 2 provide focused spotted owl habitat conservation in PACs and HRCAs beyond what is recommended in the CSO Conservation Strategy. This focused protection is combined with the more general conservation strategy of variable density thinning, which protects the largest trees in clumps and promotes the long-term development of a heterogenous forest structure. These combined conservation measures help sustain forest habitats on the landscape over the short-term as well as the long-term and as such are not expected to further degrade the level of existing viability.
Mature Forest Species (I1-12; I1-13)	Request for development of Design Features for Mature Forest Species to reduce impacts to less than significant	Comment considered but no changes needed	The mission of the Forest Service is to sustain the health, diversity, and productivity of the Nation’s National Forests both now and into the future. Extensive recent research indicates that the current forest condition is unsustainable and presents an imminent threat to the viability of old forest-dependent species (North et al. 2022). As professional land managers, one of our goals for this project is to reduce tree stem density and fuel loads in alignment with the best available guiding research to create greater forest resiliency to catastrophic wildfire. Much of the current best-available-science indicates that the forest conditions promoted by the 2004 SNFPA are unsustainable under the current climate, and conserving dense forest conditions wherever they occur presents unacceptable levels of risk (Steel et al. 2023). The proposed actions in Alternatives 1 and 2 provide focused spotted owl habitat conservation in PACs and HRCAs beyond what is recommended in the CSO Conservation Strategy. This focused protection is combined with the more general conservation strategy of variable density thinning, which protects the largest trees in clumps and promotes the long-term development of a heterogenous forest structure. These combined conservation measures help sustain forest habitats on the landscape over the short-term as well as the long-term and as such are not expected to further degrade the level of existing viability.

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Nesting Birds/Herbicides (I31-18)	Well documented impact of herbicides on nesting birds and denning mammals. Is herbicide application planned during or after nesting and denning seasons?	Comment considered but no changes needed	The potential effects of herbicide application were analyzed for a total of 18 species listed as endangered or threatened under the ESA, species that are proposed or candidate species for listing under the ESA, or Forest Service sensitive wildlife species that could occur in the Project area. Treatments that would use herbicides or pesticides, including herbicide application and borate stump treatment, would likely not adversely affect most wildlife species in the analysis because they will be used according to their label and provisions for herbicide transportation, handling, application, and emergency spill response and reporting will be followed. Where impacts could occur (e.g., western bumble bee, monarch) additional analysis is included. All herbicides included in the project proposal are approved and regulated by the US EPA and California Department of Pesticide Regulation (DPR). Product labels and DPR specify use restrictions and personal protection equipment required to reduce risks to humans and the environment. The Forest Service has developed further Design Features (Appendix A) to reduce risks to humans and the environment. Appendix A does not include further design features related to the timing of herbicide application relative to nesting and denning wildlife because analysis did not identify likely impacts associated with those activities.
Post-fire Refugia (I8A2-4)	Species displaced by the Dixie Fire seeking refugia in the project area (Mapes) may be further impacted by project activities.	Comment considered but no changes needed	The comment would like us to consider the effects on species that may move into the project area after being displaced by (future) nearby fires. The possibility of an influx of animals, for example spotted owls, seeking refugia was not directly addressed in the EA, however cumulative effects of the project are discussed on page 3.2-20: “Alternative 1 would retain the most important habitat for California spotted owl and northern goshawk in the existing PACs and HRCAs, but the reduction of suitable habitat occurring outside of PACs and HRCAs would decrease the availability of suitable habitat to set aside new PACs and HRCAs in the future.”

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Treatment Effectiveness and Bird Populations (I30-5)	Treatments effectiveness in reducing fire risk is short-lived but can be devastating to bird populations	Comment considered but no changes needed	It is unclear which studies the commenter is referencing. There is little to no controversy that thinning followed by prescribed fire is highly effective in significantly reducing the risk of catastrophic wildfire. They may be referencing a study by Newman et al. 2017 conducted near in Mendocino County, California which found a 60 percent reduction in bird populations in masticated chaparral. In the discussion of this paper, it highlights that this result was different from similar studies in seasonally dry forests. Additionally, Burnett et al. 2014 found fuels reduction treatments in the Sierra Nevada, including on the Plumas National Forest, only had a modest effect on bird community composition and abundance. Moreover, mastication treatment would not occur in the same chaparral habitats evaluated in the referenced study and would occur at a scale that is nominal when compared to the overall landscape of the Plumas National Forest.
Snag Habitat (I31-15)	Does the project overlap R-5 Post Fire Hazardous Tree Removal project? Concerns about impacts to snag dependent wildlife - call for population surveys.	Comment considered but no changes needed	The Region 5 Post-Disturbance Hazardous Tree Management Project is listed in Table 3-1 of the EA under Cumulative Projects in the Project Vicinity and is considered in cumulative effects analyses for all alternatives.
Salvage Logging/Wildlife (I31-16)	Large snags used by wildlife, fisher observed in dixie fire footprint, salvage logging operations, did not observe the fisher again	Comment considered but no changes needed	The Community Protect - Central and West Slope Project does not propose any salvage logging.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Botany			
Botany/Wildlife (I32-3)	Special-status Species including California Spotted Owls, Foothill Yellow-legged Frogs, Butte County Fritillaries, Humboldt Lilies	Comment considered but no changes needed	Species-specific surveys for CSO, NOGO, FYLF, and CRLF will be conducted prior to project implementation and appropriate measures will be applied to eliminate or minimize disturbance, particularly to breeding activities. Treatments proposed for areas occupied by federally listed or FS Sensitive Species are different than those applied to the unoccupied areas to protect important habitat elements. This project aims to balance maintaining important habitat for listed and sensitive species while reducing the risk of wildfire which can often have negative impacts to these same species. Species-specific surveys for CSO, NOGO, FYLF, and CRLF will be conducted prior to project implementation and appropriate measures will be applied to eliminate or minimize disturbance, particularly to breeding activities. Treatments proposed for areas occupied by federally listed or FS Sensitive Species are different than those applied to the unoccupied areas to protect important habitat elements. This project aims to balance maintaining important habitat for listed and sensitive species while reducing the risk of wildfire which can often have negative impacts to these same species. Appendix A, Design Feature Botany-1 and Botany-2.
Botany/Wildlife (I35-6)	Rights of nature, trees, and wildlife	Comment considered but no changes needed	The National Forest Management Act (1976) directs Forest Service actions to be planned and implemented in a manner which maintains ecological diversity and integrity (subpart 219.8 and 219.9). The Plumas National Forest completes this through the Forest’s Land and Resource Management Plan (1988 and as amended). This includes direction to move forests toward conditions with reduced risk of high severity wildfire. The NFMA requires impacts to sensitive plants and wildlife species to be analyzed. Additionally, the Endangered Species Act and LRMP, as applied, protect rare and sensitive species and their habitats which may occur within the project area.
Botany (I3-13)	Support for Treatment in Serpentine Areas using best available science	Comment considered but no changes needed	Serpentine soils will be protected under Design Feature Botany-7 and Botany-9. Serpentine areas that lie within Special Interest Areas (e.g., Red Hill SIA) will get additional protection and consideration under Design Feature Botany-6.
Botany (I3-14)	Request for invasive species management in serpentine areas mechanically treated	Comment considered but no changes needed	All invasive Design Features will apply to, and protect, serpentine soils. Serpentine areas that lie within Special Interest Areas will get additional protection and consideration under Design Feature Botany-6.
Botany (I1-27)	Invasive Species Design Features	Analysis supplemented, improved or modified	The following was added to Design Feature Invasive-3: "Clean all off-road equipment and require inspection prior to leaving areas infested with noxious weeds"

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Botany (I3-15)	For treatment in serpentine areas, recommendation to collaborate with CNPS, indigenous communities, and ecologists	Comment considered but no changes needed	These groups were included in scoping. We invite and encourage them all to participate in the project development.
Botany (I1-25)	Request to add analysis of several special-status plant species in the project area and botanical analysis area	Comment considered but no changes needed	Analysis of Sensitive plant species is in the EA as required. Analysis of watch list and CA-state listed species is at the discretion of the journey level botanist and not mandatory. Many of the state listed species are on the FS Watch list, and therefore will be considered during surveys and may receive protection measures. <i>Lupinus dalesiae</i> was removed from the Sensitive species list in 2014 because that level of protection was not warranted.
Botany (I1-26)	Request to modify/add botanical Design Features	Comment considered but no changes needed	Design Feature 1 follows guidelines in FSM 2670.22 and 2670.32 to conduct surveys to "Identify every species noted in the field to the extent necessary, to ensure that it is not a sensitive species. Note look-alikes when applicable"
Botany (I20-5)	Closed-Cone Cypress acreage summary discrepancy	Comment considered but no changes needed	PNF rare plant data list 93 acres of McNabb Cypress Occurrences within Protect Project treatment areas. All occurrences of McNabb Cypress, known or found during surveys, will be protected according to Interim Management Prescriptions as required by Design Features Botany-2 and Botany-4.
Special Interest Areas (I3-27)	Remove Special Interest Areas (SIAs) that have minimal acreage in project area.	Comment considered but no changes needed	Botany Design Feature 6 " PNF will consult with the PNF botanist prior to implementation of work within designated and proposed botanical Special Interest Areas (SIAs) (i.e., Butterfly Valley Botanical Area, Fowler Lake, Little Volcano, McNab Cypress, McRae Meadow, Mount Fillmore, Valley Creek). Treatments will be designed to maintain the integrity and suitability of these areas for which they were proposed. New permanent fuel breaks will not occur in SIAs."
Special Interest Areas (I3-28)	SIAs: work with CNPS to develop treatments for particular SIAs	Comment considered but no changes needed	The Native Plant Society was included in scoping. We invite and encourage them to participate in the project development.
Strawberry Valley (I37-7)	Unique microclimate and botanical resources in Strawberry Valley; call for special protections	Comment considered but no changes needed	The EA analyzes potential effects on special-status plant species that are know to or have the potential to occur in the project area. Botanical surveys are completed prior to project implementation to identify populations of special-status plants, and appropriate measures are applied in project design features to mitigate impacts to those species. Additionally, trees greater than 30 inches diameter are not identified for removal in any action alternative analyzed for the project.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Climate Change			
Carbon Emissions (I17-20; I22-7; I22-8; I32-6; I31-5; I31-21)	Comment claims fuels treatments emit more carbon than wildfire, or that thinning reduces carbon sequestration	Literature/science considered	Literature is not relevant to this project. The research cited compares global emissions from deforestation (primarily from land use changes) to global wildfire emissions prior to 2016, which was prior to the current era of climate-induced megafires. On the project scale, carbon emissions from the proposed action are expected to range from neutral to modestly beneficial (See EA at Page 3.6-14). The comments provide no relevant evidence to indicate the EA analysis is incorrect. In addition, the average area burned statewide could increase by 77 percent by the end of the century (see California’s Fourth Climate Change Assessment, Statewide Summary Report (CFCCA 2018)), thus emissions estimates based on historic wildfires are not relevant when predicting future wildfire emissions with climate change.
Cumulative Effects			
Cumulative Effects (I11-20)	Active Projects Within the Footprint of the Treatment Area - Disclose Impacts of Serial Treatment	Comment considered but no changes needed	Previous projects implemented within the footprint of the Project area reflect the existing condition prior to implementation of any potential future treatments under the Project. The EA evaluated implementation of proposed treatment methods, including multiple treatment methods and multiple entries (e.g., hand-cut, hand-pile, pile-burn, prescribed fire) and recurring treatments (e.g., prescribed fire followed several years later by another prescribed fire) (EA pg. 2-1).
Mapes Project (I18A2-3)	The Mapes EA did not address the cumulative effects of the Dixie Fire, nor discuss why fuel treatments such as those proposed in this project were unsuccessful at stopping the Dixie Fire. The Forest Service must reconsider its use of "logging-related" project activities in a new era of fire.	Comment considered but no changes needed	The Mapes Project was cancelled and no longer applies regarding cumulative effects for the Central and West Slope Project.
Forest Health/Resilience			
American Valley Conditions (I14-5)	Outlining local conditions in American Valley	Comment considered but no changes needed	Statement noted

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Executive Order 14072 (I15-6, I3-16)	Project violating several of President Biden’s executive orders aimed at retaining carbon in forests. Demonstrate how findings from FS-1215a were integrated into the Project	Comment considered but no changes needed	<p>Executive Order 14072 has been referenced the Air Quality section 3.6.2. Executive Order 14072 instructed the Department of the Interior, Bureau of Land Management (BLM) and Forest Service to define and inventory old-growth and mature forest for lands managed by the agencies. The old growth and mature definition, identification criteria, and resulting initial inventory reported [in FS1215a] meet this direction and identify these forests in a consistent way at a national scale. Applicable Forest Service and BLM land management plan direction constitutes current management direction for old growth and mature forests on individual management units. This definition and initial inventory effort does not change existing LMP management direction. (Forest Service 1215a, April 2023).</p> <p>The reduction of stand density across stands should improve the health and growth of existing trees (EA, pg. 2-10). Thinning for forest resilience and fuel reduction under the Project would focus on removing smaller and medium-size trees to allow for retention of larger, more fire-resilient trees (EA, pg. 2-3), and therefore resilient live carbon storage in those large trees.</p>
Old growth forest (I17-2)	Old growth, carbon capture, logging concerns	Comment considered but no changes needed	<p>The effects of prescribed treatments in relation to carbon capture are discussed in the Protect Project EA. Specifically, the EA discusses how under the No Action Alternative, the potential negative impacts to air quality and carbon loss are much higher as compared to any of the actional alternatives (EA, pgs. 3.6-8 to 3.6-19). There is a targeted discussion on the positive impacts that treatments would have on carbon sequestration as well (EA, page 3.6-18 to 3.6-19). In Treatment Methods, it is documented that the thinning is removing small trees and medium sized trees, leaving larger more fire resilient trees. It is also disclosed that thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions. All alternatives follow Forest Service policy, guidance and incorporate the latest direction and science designed and analyzed in an interdisciplinary approach. Additionally, the suite of treatments not only include mechanical thinning (termed as "logging" by commenter), but also "service" type working including manual hand treatments and prescribed fire.</p>

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Old growth forest (I37-9)	Listed impacts to old growth from logging aspects of the project	Comment considered but no changes needed	Comments included intense desiccation of rainforest microclimate, strong wind exposure due to more open stands, increased exposure of record size trees to droughts, wildfires and windstorms and accidental illegal cutting of record size trees. Regarding desiccation and wind exposure due to stands being more open after treatment, variable density thinning takes advantage of topographic position including aspect and topography. Stands in drainages and north facing aspects will likely have higher residual densities. Regarding increased threats from droughts and wildfire, lowering overall stand densities is intended to increase stand resiliency (EA, page 2-10). The Protect Project does not promote any type of illegal activity, including the "poaching" of trees. Illegal activities are prohibited and are within the purview of law enforcement; therefore, they are outside the scope of this Project.
Old growth forest (I3-17, I3-18)	Comment expresses concern about conditions of old growth conditions within the forest, and provides recommendations for how to map and treat mature and old growth forests	Comment considered but no changes needed	The Forest Service agrees with this concern regarding old growth conditions. Given the warming climate, high severity fire poses a significant threat to the remaining mature and old growth forests. The action alternatives that have been proposed under this project follow law, regulation, and policy.
Executive Order 14072 (I39-26)	Project is threatening mature and old growth forests (EO direction) (provides link to EO provided) (references Mildrexler et al. 2020, Bartowitz et al. 2022, and Lutz et al. 2018).	Comment considered but no changes needed	The Project does not propose cutting any live tree above 30.0 inches dbh (EA, Table 2-4, and Table 2-5), except in the case of hazard trees (EA, Appendix B, "Hazard Tree Removal Guidelines," pgs. B12–B16). Additionally, the reduction of general stand density across the stand should improve the health and growth of existing trees (EA, pg. 2-10). Furthermore, thinning for forest resilience and fuel reduction will focus on removing smaller and medium-size trees to allow for retention of larger, more fire-resilient trees (EA, pg. 2-3).
Fuel Treatments and Nutrient Depletion (I30-1)	Fuel treatments cause nutrient depletion	Comment considered but no changes needed	It is unclear which studies the commenter is referring to. Some studies such as Clinton and Vose 2007 show high amounts of nitrogen loss after prescribed fire. Although, this paper also highlights that high intensity ground fires may lead to higher amounts of nutrient loss. Therefore, large high severity wildfires such as the Dixie Fire most likely had large amount of nutrient loss. The purpose and need of this project are to reduce fuels and decrease potential for extreme fire behavior and therefore preventing larger amounts of nutrient loss in the future.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Forest Resiliency (I30-2)	Forest is a wholistic system, thinning causes decrease in resiliency	Comment considered but no changes needed	It is acknowledged that the forest is an ecosystem. It is unclear what studies the commenter is referring to regarding the fact that trees communicate with each other and share nutrients. They may be referring to work by Simard et al regarding mycorrhizal networks and communication. In Treatment Methods, it is documented that the project plans to remove small trees and medium sized trees, leaving larger more fire resilient trees. This will in turn increase forest health. It is also disclosed that thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions, favoring a healthy ecosystem. All alternatives follow Forest Service policy, guidance and incorporate the latest direction and science designed and analyzed in an interdisciplinary approach.
Forest Service Tree Spacing Standard (I8A2-13)	The marking done under the Mapes project prescriptions significantly exceeded the Forest Service's standard for spacing that maximizes growth and prevents mortality.	Comment considered but no changes needed	Unknown how the commenter came up with the statement that the Forest Service has a standard 20-foot, single tree spacing that maximizes growth and prevents mortality. The Protect project intends to use stand density index (SDI) post-treatment stand density. As implied in the name, SDI is a metric that looks at overall density at the stand level, not on individual tree spacing.
General (I35-7)	List of concerns regarding forest health impacts from the project	Comment considered but no changes needed	The commenter provides a list of twenty project impacts they are concerned with though does not raise specific issues related to the adequacy, accuracy, or completeness of the EA. Topics the commenter raise include destruction of individual plants and wildlife to the whole ecosystem, increase in fire danger, decreases in key systems such as sequestration and oxygen production, increase of climate change, concerns about soil erosion, wind protection, and decrease in humidity, and increased gaps in forest. They also bring up misuse of taxpayer money. In the Treatment Methods, it is documented that the project plans to remove small trees and medium sized trees, leaving larger more fire resilient trees. It is also disclosed that thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions. All alternatives follow Forest Service policy, guidance and incorporate the latest direction and science designed and analyzed in an interdisciplinary approach. Additionally, the EA discusses how under the No Action Alternative, the potential negative impacts to carbon loss are much higher as compared to any of the actional alternatives (EA, pages 3.6-8 to 3.6-19). This project is meant to promote forest health while reducing fire hazard, particularly in communities in the wildland urban interface of the Plumas National Forest.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Fire and Fuels/Silviculture			
Aspen Treatment (I8A2-14)	Aspen improvement activities are not included in the Community Protect projects	Factual corrections made	Although portions of the Protect project overlap with the Mapes project, aspen enhancement treatments from the Mapes project were not carried forward to this Project; therefore, this comment is out of scope of the Project.
Species Prioritization (I17-5)	White fir concerns because they are a shade-tolerant species.	Comment considered but no changes needed	The EA implicitly identifies that treatments will prioritize shade-tolerant species for removal (Draft EA pg. 2-3). White fir is a shade-tolerant species and therefore will be prioritized for removal.
Canopy/Fire Intensity (I17-12)	Closed canopy results in ten percent reduction in fireline intensity; open canopy increased risk in fireline intensity by 36 percent	Comment considered but no changes needed	Literature cited (Platt et al 2006) study area and methodology are specific to the Colorado Front Range ecosystem. While the author notes that limitation, they also mention the methodology that could be used in other geographic regions. However, documented in the literature are multiple references to the Colorado Front Range characterized by a mixed-severity fire regime in which severe crown fires occurred as well as surface fires. This would be a different natural range of variability than in the Central West Slopes project area which under pre-settlement conditions, yellow pine and mixed-conifer forests in the Sierra Nevada supported fire regimes characterized by frequent, low- to moderate-severity fires. These characteristics placed pre-settlement Yellow Pine Mixed Conifer forests in Fire Regime I (fire-return intervals [FRI] 0 to 35 years, low to moderate severity),(from Safford and Stevens 2017 GTR 256). This difference in NRV and subsequent divergent vegetation conditions does not align with making more than general assumptions on how this research may or may not be pertinent to the proposed actions and purpose and need in the EA. Therefore, one cannot come to the conclusion that data and outcomes generated from this Platt 2006 methodology would apply to the Central West Slope project area.
Canopy (I8A2-8)	Maintaining closed-canopy forest has been shown to suppress or stop seedling development, but there is no mention of this beneficial tradeoff in the EA.	Comment considered but no changes needed	Correct. There is no mention of seedling development within the Protect Project EA. This commenter states that the relationship between seedling development and closed canopy conditions comes from a "California Forest Service silvicultural research paper" from 1958, but no such document was attached.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Canopy (I7-7)	Denser canopies provide more moisture content and cooler temperatures at ground level to help suppress fire	Comment considered but no changes needed	The statement is misleading that denser forests provide more moisture content and cooler temperatures to suppress fires, as is listed in the Countryman (1956) periodical. Estes (2012) found that overall, even when fuel moisture varied between treatments, differences were small. The long nearly precipitation-free summers in northern California appear to have a much larger effect on fuel moisture than the amount of canopy cover. Fuel moisture differences resulting from stand thinning would therefore not be expected to substantially influence fire behavior and effects during times of highest fire danger in this environment. Additionally, Hardage (2022) found that in dry years, thinned stands had significantly higher soil moisture later in the summer compared to the untreated control. In contrast, soils in the control dried out much earlier in the season. This suggests that trees in the thinned stands would be much less drought stressed. It also suggests that delaying the onset of soil moisture recession could reduce the risk of wildfire.
Clear-cutting (I13-2)	Clearcutting is not the answer nor an easy way	Comment considered but no changes needed	There is no clear cutting proposed by the Protect Project. The Project intends to thin using a variable density approach that includes clump retention, matrix thinning and creation of gaps. Gap sizes would range from 0.1 to 3 acres and may make up to approximately 10 percent-20 percent of the Project area (EA, page 2-3).
Community Protection (I38-3)	Communities need to be protected first	Comment considered but no changes needed	All three action alternatives are designed to protect communities in the project area from wildfire.
DBH Limit (I39-6)	Upper limit removal of 30-inch DBH trees are most fire resistant, most commercially valuable and will likely exacerbate wildfire behavior rather than suppress it.	Comment considered but no changes needed	The project focuses on removing surface fuels, ladder fuels, biomass and intermediate overstory trees. There will not be a total overstory removal. It is critical to treat the surface fuels to achieve project purpose and need. FlamMap modeling has demonstrated differences between alternatives and modeling has demonstrated a reduction in fire risk that is associated with surface fuel reduction. The comment conclusion that this will exacerbate wildfire behavior ignores the proposed surface and ladder fuels reduction treatments.
DBH Limit (I39-7)	The project documentation provides no assurance or guarantee that removal of 30-inch DBH trees will be a minimum.	Comment considered but no changes needed	The Community Protect project does not propose removing trees greater than 30 inches dbh as suggested by the commentator.
DBH/TPA (I39-20)	TPA by DBH class is missing, not clear what needs to be done to effectively reduce fire danger.	Comment considered but no changes needed	The commentator is correct, Trees per Acre (TPA) by DBH class is missing. However, this metric is not needed for decision, nor to demonstrate achievement of the purpose and need.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Dozer Lines (I3-20)	Dozer line and Bucks Lake Wilderness	Comment considered but no changes needed	Comment is generally supportive of proposed project activities within and adjacent to the Bucks Lake Wilderness and points out that their completion should protect the wilderness from future fire suppression impacts.
Fire Line (I2-8)	Proposed Permanent Fire Line Plan and Modification Suggestions related to Potential Operation Delineations and Community Input	Analysis supplemented, improved or modified	Some Potential Operation Delineation (POD) boundaries are included in the plan to maintain existing firelines that were completed during suppression efforts. However, not all POD boundaries are appropriate to install and maintain permanent firelines. Information was added to the EA saying that some POD boundaries may be utilized around communities and could possibly be used to implement prescribed fire on public and private lands. Additionally, information regarding maintenance of firelines installed during the project was also added.
Fire Line (I3-12)	Support for permanent fire lines	Comment considered but no changes needed	Comment is supportive of establishing and maintaining permanent firelines around communities. The commentor points out that firelines may also provide a recreation purpose, which is not within the scope of the project.
Forest Density (I31-4)	Why has the USFS relied on only one publication discussing the density of forests, when recent papers provide ample evidence that historic forests were both open as well as relatively dense.	Comment considered but no changes needed	See remarks to comment I31-11.
FIA Plots (I39-21)	Spatially explicit tree distribution within and around the project area could be done using FIA plots, data from private industrial landowners, and available USGS lidar.	Comment considered but no changes needed	FIA plot data was used as part of the FlamMap modeling process, disclosed in section 3.1.4. Modeling compares alternatives for the purpose of decision. Tree distribution data is not a metric needed for decision, nor is it needed to demonstrate achievement of proposed actions.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Fire Modeling (I7-14)	Simulation studies that use certain fire modeling systems have been shown to have significant underprediction bias when used to assess fire behavior in conifer forests in western North America	Comment considered but no changes needed	<p>The comment lists several fire “modeling systems” (i.e., NEXUS, FlamMap, FARSITE, FFE-FVS (Fire and Fuels Extension to the Forest Vegetation Simulator), Fuel Management Analyst (FMAPPlus), BehavePlus). The only model used for fire modeling for the Plumas Protect Project was FlamMap. FlamMap has been utilized in dozens of peer reviewed scientific publications to quantitatively assess existing and post treatment conditions and trends in wildfire hazard, risk, and change in these metrics due to fuel treatments. In addition, FlamMap is commonly used to assess fire hazard and risk both private, public (US Forest Service, National Park Service, Tribal, and Department of Defense owned and managed lands across the Western United States. The specific fuel treatments planned for implementation include thinning from below followed by prescribed burning. This treatment combination has repeatedly demonstrated to be effective at reducing flame length, fire severity, and improving firefighters’ ability to conduct fire line construction and burnout operations in multiple studies cited in the EA and in the peer reviewed literature. The analysis was completed using published fuel models from Scott and Burgan (Scott 2005) “Uncalibrated custom fuel models” were not used in the analysis. Building a new or improved fire model for use on this specific project is beyond the scope of the Environmental Assessment.</p> <p>A synthesis of real world, post wildfire assessments of fuel treatment effectiveness found the following:</p> <p>“Seventeen of the 18 case studies occurred in the western United States, and all were primarily focused on forested ecosystems. Surface fire behavior was more commonly observed in areas treated for fuel reduction than in untreated areas, which managers described as evidence of treatment effectiveness. Reduced fire intensity diminished fire effects and supported fire suppression efforts, while offering the potential to use wildfires as a fuel treatment surrogate.”</p>
Fire Modeling (I39-25)	Fire modeling should be done under less extreme conditions for example 80th percentile, most acres burned do not burn under the most extreme conditions. (References Bartowitz et al. 2022)	Comment considered but no changes needed Literature/science considered	The weather and fuel conditions used for fire modeling for project analysis are consistent with direction in the Forest Plan (SNFPA ROD, 2004).
Fire Weather/Clear cuts (I7-6)	Fire-weather conditions near ground level are more severe in clear cut area than in partial cut areas	Comment considered but no changes needed	This is a well-documented phenomenon. Clear cuts are not proposed in the project.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Forest Health and Fuels Reduction projects (I8A1-14)	Forest Health and Fuels Reduction projects result in a near-term resumption of fuels problems, species conversion, and thicket creation through seed bed creation.	Comment considered but no changes needed	The commenter indicates that natural regeneration of potentially undesired conifers species in a "thicket" is a result mechanical equipment churning up the soil which can provide a seedbed. However, natural regeneration is often a natural response to disturbance, including mechanical equipment. Additionally, the Protect Project EA intends to use recent science that suggests the use of stand density index (SDI) to promote forest health (EA, pg. 2-10). The EA also states that multiple different treatment methods could apply to an individual planning unit to achieve desired objectives, including the use of prescribed fire (EA, pg. 2-3)
Forest Health and Fuels Reduction projects (I8A1-11)	Forest Health and Fuel Reduction projects raise the base canopy height too much and lack vertical and horizontal diversity creating overall homogenization of conditions.	Comment considered but no changes needed	The commenter is vague in describing which project he has observed these post-treatment conditions. The EA states that the project will use variable density thinning to produce a mosaic of trees and create structural heterogeneity (page 2-3)
Fuels Treatments/ Restoration Projects (I7-23)	Fires spread faster after restoration and fuels treatments relative to untreated stands	Literature/science considered	<p>In the reference literature Stephens et al. (2021) (in the same paragraph after the commentor quoted increased rates of fire spread after fuels and restoration treatments), Stephens et al. states that "importantly, crown consumption, a proxy for crown fire activity, was far lower for both the fuel (10 percent) and restoration (13 percent) treatments relative to the pretreatment conditions (85 percent)". So, although the rate of spread was increased in that example, the intensity and severity due to the lack of crown fire behavior would have been drastically lower in the treated stands. The general goal of fuel treatments in the EA is to "modify wildfire behavior to a lower intensity surface fire with reduced burn severity and diminished crown fire potential that would mimic conditions occurring under a natural fire regime..."(EA purpose and need). To be successful in meeting project goals, less than 20 percent of the project area should have crown fire potential under 98th percentile weather (EA 2.1.1 Desired Conditions). Alternatives 1 and 2 both meet this goal at 7 percent crown fire post treatment. In contrast, no action results in 30 percent crown fire and alternative 3 results in 36 percent crown fire, not meeting project objectives. Although it appears that the Stephens et al. (2021) reference is incongruent in terms of rate of spread, project objectives are measured in terms of crown fire which Stephens et al. (2021) directly supports in the same paragraph.</p> <p>The Purpose and Need has been edited in response to this comment to remove reference to the rate of fire spread (Final EA, pg. 1-4). This is the only place this metric was referenced in the Draft EA.</p>

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
High Density Forest/Fire Severity (I7-24)	High severity fire was not higher in unmanaged, higher density forests, where spotted owls live	Literature/science considered	The commentor finds no correlation between pre-fire snag density and fire severity, but fuel reduction logging associated with high fire severity. The sample size was from a single fire, the Creek Fire and in the study the author acknowledges the limitations of generalizing results from a single sample (also Steel, Safford, and Viers 2015). In contrast, research on the Plumas and Lassen forests have found significant variables driving severity (at temperatures above 81 degrees Fahrenheit) were fuels (snag basal area and shrub cover). A positive relationship has been identified between initial fire severity and the severity of a subsequent reburn (Coppoletta et al 2016). Standing snags affect fire behavior and spread by acting as both a source for embers and a receptive surface for ignition from embers. As standing snags fall, they contribute to elevated surface fuel loads, hinder fire suppression efforts, increase fire residence time, and indirectly result in torching of live trees because of preheating. Initial high-to moderate-severity fire leads to an increase in standing snags and shrub vegetation, which in combination with severe fire weather, promotes high-severity fire in the subsequent reburn (Coppoletta et al. 2016).
High Severity Fire (I7-15)	Fires that burned with high severity before are likely to burn with high severity again	Literature/science considered	Concur. Research on the Plumas and Lassen National Forests has found that fires that burn at high severity are more likely to have high severity reburn potential in subsequent fires (Coppoletta et al. 2016). This is particularly relevant if action is not taken to restore vegetation adapted to higher frequency, low severity fire regimes.
'How to Create Megafires' Report (I30-3)	'How to Create Megafires' Report and 1 percent difference in humidity	Comment considered but no changes needed	It is unclear what report or what references the commenter is referring to. However, in Treatment Methods, it is documented that the thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions. All alternatives follow Forest Service policy, guidance and incorporate the latest direction and science designed and analyzed in an interdisciplinary approach.
Land Management (I1-1)	Introductory text of land management they support	Comment considered but no changes needed	Noted.
Large Trees (I31-3, I31-10)	From ground-based and GIS datasets, the public is aware that multiple previously treated parts of Plumas National Forest burned with high severity during the 2021 Dixie Fire. Photographic evidence of large tree stump as argument against mechanical thinning for wildfire risk reduction.	Comment considered but no changes needed	The map cited in this comment was created by a reporter using raw data from the Forest Service FACTS database that was not QA/QC'd that lumps together all forest activities going back to the 1970s. It does not show the context of the fire that burned through the treatments (severity, intensity, fire type, or fire effects) only that the fire burned through the area. While it is true that some previously treated areas burned at high severity, it is also true that a majority of hazardous fuels treatments on National Forest Lands burned with reduced intensity at low to moderate severity.

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Ecosystem/Large Tree Impacts (I37-1, I37-6, I37-3, I37-8, I37-11, I37-14)	Opposition to project due to adverse impacts on ecosystem and large trees from large tree removal. There were several comments regarding large trees in the Project area including sugar pines, white fir, ponderosa pine. Western Native Tree Society (WNTS) - monitors trees in project area; will make public if they are cut down. WNTS has a digital database of large trees.	Comment considered but no changes needed	The Project does not propose cutting any live tree above 30.0 inches dbh (EA, Table 2-4, and Table 2-5), except in the case of hazard trees (EA, Appendix B, "Hazard Tree Removal Guidelines," pgs. B12–B16). Additionally, the reduction of general stand density across the stand should improve health and growth of existing trees (EA, page 2-10). Furthermore, thinning for forest resilience and fuel reduction will focus on removing smaller and medium-size trees to allow for retention of larger, more fire-resilient trees (EA, page 2-3). All activities proposed in the Project will either occur through direct Forest Service implementation i.e., "force account" or via contracting mechanisms. Either way, activities will be limited by what is authorized in the Protect Project EA and will incorporate BMPS. Additionally, contracts will be administered by FS officials with contractual oversight.
Large Tree Removal (I8A2-2)	Negative impacts of large tree removal near communities	Literature/science considered	There is no proposal to remove large legacy trees. Empirically the reduction of fuel loading has a direct relation to the reduction of fire intensity.
Commercial Management/Effects (I39-1)	Commercial management of forests increases wildfire risk (references Weatherspoon, 1996 and Russell et al. 2018).	Literature/science considered	References cited provide examples not pertinent to the project. References describe effects of overstory removal and retention of biomass and small trees. Treatments in the proposed action will remove surface fuels, biomass and small trees, and intermediate trees through mechanical equipment and prescribed fire. Effects of the proposed actions will be different than what is described in the cited literature.
Logging (I17-5; I15-1; I15-5; I22-5; I35-5; I38-4)	Commenters are concerned about the Project being industrial logging program and causing damage to forest, making wildfires spread faster and/or burn more severely, not following ecological knowledge or public interest. Logging companies should operate on their private land.	Comment considered but no changes needed	Statements had no supporting scientific literature referenced. The EA makes no claims to solely commercial logging. The proposed actions are a combination of prescribed fire, hand thinning, mechanical fuels treatments, mechanical tree removal, pile burning, and firelines to achieve stated purpose and need. Commercial tree removal will likely be one of the implementation strategies, but in combination with prescribed fire, which is critical to meet purpose and need. All alternatives follow Forest Service policy, guidance and incorporate the latest direction and science designed and analyzed in an interdisciplinary approach. Additionally, the suite of treatments not only include mechanical thinning (termed as "logging" by commenter), but also "service" type working including manual hand treatments and prescribed fire. The Project complies with relevant management law, policy, and direction.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Logging/High Severity Fire (I39-11)	The loss of large trees is primarily a result of past and present logging practices and that loss allowed more light to penetrate allowing small tightly packed trees that burn at high intensity in wildfire.	Analysis supplemented, improved, or modified	The project record cites both fire exclusion and intensive timber harvesting (among other factors) as factors contributing to departure from historic open stand conditions dominated by large diameter fire resistant trees with relatively low surface fuel loads interspersed with areas of early seral stands. This comment fails to acknowledge the role of fire exclusion and the transition from shade-intolerant species dominant open stands to stands where shade-tolerant species (white fir) can persist in dense arrangement. While early logging practices did factor into current fuels conditions, it is overly simplistic to claim that logging practices removing big trees is solely responsible. This project proposes to incorporate prescribed burning and biomass removal, which has been modeled to reduce the risk of high intensity wildfire in comparison to the no action alternative. Additionally, the treatment methods identify the transition to shade-intolerant, fire resistant species supported by more open stand conditions, with less white fir to persist in the understory exacerbating the fuels hazard.
Logging (I17-9)	Reiterating Main Concerns in Letter; logging, forest service and logging industry, neglecting healthy forests, habitat, carbon capture	Comment considered but no changes needed	Typical Forest Service funding comes from the Federal government through a system of Congressionally approved appropriated, permanent trust funds and grants. There are no "supplemental funds" by the private logging industry. Additionally, the effects of prescribed treatments in relation to carbon capture are discussed in the Protect Project EA. Specifically, the EA discusses how under the No Action Alternative, the potential negative impacts to air quality and carbon loss are much higher as compared to any of the actional alternatives (EA, pages 3.6-8 to 3.6-19). There is a targeted discussion on the positive impacts that treatments would have on carbon sequestration as well (EA, page 3.6-18 to 3.6-19).
Logging/Random Forests Algorithm (17-18)	Forests protected from logging, have higher biomass and have lower severity fires, using Random Forests Algorithm	Comment considered but no changes needed	In this project area the Alternative 3 and no action was modeled. Both alternative 3 (hand thin except for WUI defense) and the no action can be compared to "protected from logging" as is described in the comment. Neither alternative 3 nor the no action meets the project objectives of reducing fuels lengths to <4' at 98 percent weather scenario. In the no action, 77 percent of flame lengths will be above 4' in the 98th percent weather, and in alternative 3, 73 percent of flame lengths are modeled to be >4' in 98 percent weather. In contrast, alternative 1 includes mechanical thinning and modeling demonstrates a flamelength >4' for 20 percent of the project area at 98 percent weather. 4' is the flame length level which can be managed by hand tools and hand line. Therefore, this project doesn't meet the purpose and need if mechanical treatments are prohibited.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Logging (I8A2-7)	Logging activities trade large, fire resilient trees for small fire-prone thickets, often of undesirable species.	Comment considered but no changes needed	The Protect Project EA states that thinning will focus on smaller and medium-sized trees to allow for retention of larger, more fire-resilient trees (EA, page 2-3)
Logging Concerns (I8A2-10; I8A2-11)	The Forest Service needs to reevaluate its logging activities especially in WUI given the increase in fire risk it will cause without follow-up treatment Logging will create the need for follow-up fuels treatments, but the Forest Service has not shown they can complete that amount of follow-up treatment.	Comment considered but no changes needed	The EA states that multiple different treatment methods could apply to an individual planning unit, including the use of prescribed fire (EA, page 2-3)The program of work varies year by year and is affected by variables outside the scope of this project including funding, workforce availability and weather as well as wildfire considerations.
Logging/Sequestered Carbon (I39-5)	Past and future commercial logging results in a direct loss of sequestered forest carbon which is on average far higher annually than forest carbon losses from fire (references Harris et al. 2016, Williams et al. 2016, Berner et al 2017, Bartowitz et al. 2022). Also references Ingalsbee 2005	Literature/science considered	Harris 2016 documents information that carbon loss was primarily due to harvest (66 percent) compared to fire (15 percent) and insect loss (13 percent). This research is from 2006 -2010 and is irrelevant because it does not consider the recent fire history in the project area, on the Plumas National Forest, and on the western landscapes in the last five years. Williams 2016 is likewise not pertinent because it analyzes impacts to carbon across the entire US. Berner 2016 also uses data that does not reflect the recent fire history that is noted in the project record. The commentor highlights Bartowitz 2022 and is critical that the project harvests large trees to save them from fire. That is not a purpose and need in this project. Small and medium size trees are to be thinned to achieve the fire and fuels objectives in the purpose and need. This also includes promoting a resilient forest, which decreases the potential for tree mortality (the conditions that contribute to hazardous fuel accumulation). Conditions that promote a resilient forest and decreased potential for tree mortality are best achieved at low stand density which retains large diameter, shade intolerant, fire resistant trees. Trees will be removed in order to reduce mortality and maintain the most resilient state; therefore, the aboveground live carbon stock will be maintained in the most resilient state. Ingalsbee 2005 highlights concerns of removing large diameter canopy trees and leaving the tops and limbs (canopy fuels) in the understory. That could indeed be a fuels concern, so this project intends to mechanically thin with equipment that will harvest the whole tree. Under a whole tree harvest system the entire tree would be cut and removed to the landing for processing (Section 2.1.3).

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Logging/Herbicide (I39-24)	Herbicides and logging bring about unanticipated cumulative impacts.	Comment considered but no changes needed	Not clear from comment the rationale for changing document. General concerns about unanticipated cumulative effects from herbicides and logging. Not a finite point.
Managed Fire (I2-5)	Request to add managed fire opportunities to the project.	Comment considered but no changes needed	Due to this project being primarily a WUI focused project it is not the appropriate location to focus efforts on managing wildfire for resource benefit. We would need to significantly expand the project area to capture the area’s most appropriate for managing wildfire. Additionally, adding managed fire would require a Forest Plan amendment which would be better considered at the Forest scale rather than just the portion of the Forest currently included in this planning effort. Therefore, managed fire is out of scope of this project.
Mastication (I2-6)	Mastication and where it can be beneficial	Analysis supplemented, improved or modified	The commentor suggests specific limitations to the use of mastication to manage surface fuels, pointing out that while it is an expedient means of reducing fire behavior, the fire effects associated with retaining the surface fuels on site in a different arrangement limit the ability to utilize prescribed fire and may decrease survival in forested stands that subsequently burn in a wildfire. The project proposes a very limited amount of mastication under all action alternatives but, it may be helpful to better describe and incorporate limitations on its use in the EA. The Mastication section has been updated in the EA.
Mastication (I20-7)	Mastication and risks of homogenizing the forest	Comment considered but no changes needed	The commentor expresses that if proposed mechanical thinning treatments are allowed to be substituted for more simplified or economical methods for cost or time savings the project runs the risk of homogenizing forested stands rather than restoring heterogeneity. She calls out mastication specifically because it is cheap and fast, but commends the project design team for limiting its use to only 5 percent of treatments.
Mechanical Thinning/Effectiveness (I34-3)	Effectiveness of Mechanical Thinning	Factual corrections made	There is little to no controversy that thinning followed by prescribed fire is highly effective in significantly reducing the risk of catastrophic wildfire. The action alternatives clearly state that treatments would include a combination of actions including prescribed fire, manual thinning, and mechanical thinning to achieve the purpose and need. The “Treatment Methods” section (2.1.3) has been updated to state more explicitly that all areas planned for treatments would likely receive more than one type of treatment. Moreover, the example in the Draft EA stated that, “for example, an initial mechanical treatment that substantially reduces stand density would achieve desired conditions for much longer than an initial manual treatment that only reduces ladder fuels” (Draft EA pg. 2-3).

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Mechanical Thinning/Effectiveness (I34-6)	Effectiveness of Mechanical Thinning	Comment considered but no changes needed	The commentor states his skepticism that thinning as a primary method of wildfire mitigation is effective. However, his comments disregard the fact that prescribed fire is planned as a follow-up treatment in all areas planned for thinning. Research has shown that thinning alone produces mixed results, however, thinning followed by prescribed fire is highly effective in significantly reducing the risk of catastrophic wildfire, which is the treatment combination proposed in all action alternatives of the project.
Mechanical Thinning/Emergency (I18-20)	Choosing any alternative that requires mechanical thinning does not respond to the stated emergency and "critical, time-sensitive" nature of the projects P&N to implement fuels treatments that mitigate the risk to communities from wildfire.	Comment considered but no changes needed	Mechanical thinning is not the only treatment option proposed in the Protect Project EA. Other treatment options proposed include "service work" such as grapple piling, mastication, manual (hand) treatments, prescribed fire and pile burning (EA, pages 2-5 to 2-6). Depending upon the area, any of these treatments may be prescribed and multiple treatments may be needed to meet objectives (EA, page 2-3). Maintenance of treatments is also considered (EA, page 2-3).
Mechanical Thinning/Impacts (I18A2.9)	Significant regeneration as a result of mechanical thinning versus handthin/burn only	Comment considered but no changes needed	Alternative 1 (EA, Section 2.3, Pg. 2-9) proposes "...recurring maintenance treatments, such as prescribed fire several years after an initial treatment to maintain desired conditions." This language is also echoed in Alternative 3 (EA, Section 2.5, Pg. 2-22). Alternative 2 is not as clear about recurring maintenance treatments but states that multiple entries would occur to achieve the purpose and need. Regeneration of shade tolerant conifers such as white fir and cedar would occur in the project area under the no-action alternative as well.
Mechanical Thinning/Impacts (I18A2-12)	The intensive mechanical thinning prescriptions in the EA (Mapes) fail to adhere to SNFPA direction to increase the frequency of large trees, etc.	Comment considered but no changes needed	This comment is specific to the former Mapes project, and it is unclear how it is related to the Project.
Mechanical Thinning/Logging/Impacts (I18A1-16)	Where logging or mechanical thinning has occurred in mid-elevation forests fire-prone thickets of regeneration have been created dating back to the last mechanical disturbance.	Comment considered but no changes needed	The pictures of "thickets" by the commenter show young, natural regen of seedling height that are not ladder fuels because they come nowhere near the base canopy of the dominant trees. Additionally, natural regeneration is often a natural byproduct of any type of disturbance. Furthermore, the EA states that multiple different treatment methods could apply to an individual planning unit to achieve desired objectives, including the use of prescribed fire (EA, page 2-3)

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Mechanical Thinning/Impacts (I31-12)	Examples of high severity fire in other forests and science to back up trend of increased high severity as a function of massive thinning operations is backed up by Downing et al. (2022) and Bradley et al. (2016).	Analysis supplemented, improved, or modified	Downing et al. (2022) looks at Cross-Boundary Wildfire Transitions. It's findings do not speak to trends in fire severity or drivers of those trends, but they do support the purpose and need for this project, which acknowledges that cross-boundary wildfire spread is inevitable in the fire-prone Sierra Nevada landscape and attempts to reduce the vulnerability of communities and the high-value assets and natural resources associated with them, which is directly in line with the conclusions of the study. Bradley et al. (2016) looked at the relationship between fire severity and forest protection. Conclusions of the study suggest that treatment efforts should be focused on nearest homes (in the WUI) and that fires should be allowed to burn unimpeded in the backcountry. The Community Protection project is strictly a WUI focused project and does not seek to address conditions in the backcountry. The Plumas National Forest has been successful at allowing some fires to burn under a confine/contain strategy in the backcountry (currently the only fire management strategy that the Forest Plan allows is full suppression, which confine/contain complies with) but, in order to expand the use of this strategy, greater protections for communities and their vital infrastructure are needed to support increased risk associated with allowing wildfires to burn for resource benefit. The Final EA has been updated to include reference to managing fire in the backcountry in Chapter 3, Section 3.1, "Fire and Fuels" (pg. 3.1-12).
Mechanical Thinning/Impacts (I8A1-15)	Mechanical thinning creates a reversion of forest health and fire resiliency that must be taken into account in effects analyses.	Comment considered but no changes needed	The commenter indicates that natural regeneration of potentially undesired conifers species in a "thicket" is a result mechanical equipment churning up the soil which can provide a seedbed. Hence mechanical thinning is a reversion of forest health and fire resiliency. However, natural regeneration is often a natural response to disturbance, including mechanical equipment. Also, the Protect Project Additionally, the Protect Project EA intends to use recent science that suggests the use of stand density index (SDI) to promote forest health (EA, page 2-10). The EA also states that multiple different treatment methods could apply to an individual planning unit to achieve desired objectives, including the use of prescribed fire (EA, page 2-3)
Mechanical Thinning/Impacts (I7-26)	Forest Service scientists have stated thinning can lead to higher severity fires, yet this is contradictory to their promotion of thinning	Comment considered but no changes needed	While some research concludes that thinning can lead to higher severity fire, these potential effects are mitigated by follow-up management of surface fuels through treatments such as prescribed fire, mastication, grazing, or herbicide application. The project proposes to utilize prescribed fire throughout the project to reduce surface and ladder fuels. This combination of thinning followed by prescribed fire has proven to be the most effective method for reducing the risk of catastrophic wildfire.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Mechanical Thinning/Large Tree Removal (I31-17)	In thinning operations, largest trees often get removed since they will make the contractor the most money	Comment considered but no changes needed	It is unclear if the commentor is accusing Forest Service contractors of deliberately cutting unmarked large trees in thinning projects or if the comment is associated with some other activity. Her observations do not match up with the overwhelming majority of thinning projects completed on the landscape on national Forest lands.
Mechanical Thinning/Slow Implementation (I18-18)	Mechanical thinning is not an expedient means of treatment. Commenter provides examples in Graeagle area.	Comment considered but no changes needed	Contractual obligations and timeframes are outside the scope of the activities proposed for and analyzed in this project.
Microclimate (I22-2)	Trees effect on microclimate/fire	Comment considered but no changes needed	The commentor cites a nonprofit promotional case study of a non-native eucalyptus forest/grassland with a fog drip as evidence that the debris beneath trees needs removing, not the trees. However, in the Sierra Nevada frequent fire ecosystem there is a need to remove surface, ladder, and intermediate overstory fuels to modify wildfire behavior to a low intensity surface fire. The comment is not relevant because it does not take into account the difference in ecosystem drivers. The commentor does not provide a reference for trees keeping temperatures down, thereby preventing fire starts.
Microclimate (I22-4)	Trees effect on microclimate with example	Literature/science considered	Reference cited is not a peer reviewed study, it is a promotion of the management practices of nonprofit foundation. Conclusions reached in the reference may not be supported by the scientific process. The reference is not relevant because it pertains to nonnative eucalyptus, grasslands, and a different microclimate "fog drip" that is not present in the Sierra Nevada.
Microclimate (I22-9)	Trees effect on microclimate/fire with example	Comment considered but no changes needed	Not a finite point. Generalizations are used, note of Costa Rica deforestation, which is not relevant to the project area.
North et al. 2022 (I31-11)	North et al. 2022 was cited but not Baker and Hanson 2023, which shows clearly that the North et al 2022 is an overgeneralization. Also, please keep in mind that Hanson and North (2009, same North) - documented post-fire flushing in conifers that initially looked dead but were in fact alive.	Comment considered but no changes needed	Baker et al. (2023) is a rebuttal to several publications considered as current, reliable, and peer-reviewed science on relevant topics of forest ecology. The material in Baker et al. 2023 is a focused rebuttal with no new science and no comprehensive review of the literature. The false premise in Baker et al. (2023) that the scientific community is divided into two camps supporting either the “low-severity model” or the “mixed-severity model” is an example of misinformation. Neither Hagmann et al. (2021) nor the literature cited in the synthesis asserts that all pre-settlement forests were open/low-density, and all fires were low severity. Dry yellow-pine mixed conifer forests are adapted to a fire regime of predominantly low to moderate fire intensity and severity (North et al. 2016). Pockets of high severity fire occasionally opened gaps in the forest canopy (Safford and Stevens 2017). The North Big Bear project is an example of a forest health project that appropriately incorporates these principles and will

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			<p>create fine-scale mixed fire severities using variable density thinning. The silvicultural treatments will create more tree clumps and gaps than currently exist in overstocked stands while lowering overall fire hazard.</p> <p>Baker et al. (2023) is an example of a publication that falls outside of professional scientific norms. Rather than rebutting in the same top-tier ecological journal (Ecological Applications) as the original trio of papers, it was published in the Multidisciplinary Digital Publishing Institute (MDPI) family of journals. These are online journals undergoing very rapid expansion (publishing ~235,000 articles in the year 2021) with attendant controversies over lax peer review standards. As of February 2023, the journal Fire was listed as a predatory journal (List of all MDPI predatory journals [predatoryreports.org]), indicating a significant level of concern and skepticism from the scientific community. Inflammatory language utilized throughout the publication, including egregious accusations of “falsification of the scientific record” further signals to the peer community that this publication is not on equal footing as the three 2021 publications.</p> <p>The Baker et al. (2023) rebuttal heavily rests on previous studies using controversial methodologies. Over 20 years, recurring problems with methodology and interpretation in the body of work from this author group have been documented through numerous articles in high-quality journals (Hagmann et al. 2021, Tables 3, 4, 5, 6). This long-term pattern signals that use of the counter-evidence body of studies should be made in combination with findings from multiple research groups, rather than relied upon as a primary or sole source of information. Given this context, Baker et al. (2023) does not affect the reliability or applicability of Hagmann et al., Hessburg et al., and Prichard et al. (2021) to the North Big Bear project.</p> <p>As noted above, the Hagmann et al., Hessburg et al., and Prichard et al. (2021) trio review the full body of published literature and identify the areas of credible scientific consensus, including that decades of fire suppression policy has resulted in broad-scale forest densification along with increasing fire intensities and reduced forest resilience to fire (Hagmann et al. 2021). This is no longer in question among credible scientists.</p>

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Old-growth/Executive Order (I31-13)	How is the project addressing President Biden's Executive Order to protect remaining large diameter trees/old growth? - request for mapping	Comment considered but no changes needed	The project does not propose cutting large diameter trees. Executive Order 14072 is located in the Air Quality section 3.6.2. Executive Order 14072 instructed the Department of the Interior, Bureau of Land Management (BLM) and U.S. Department of Agriculture (USDA), Forest Service to define and inventory old-growth and mature forest for lands managed by the agencies. The old growth and mature definition, identification criteria, and resulting initial inventory reported [in FS1215a] meet this direction and identify these forests in a consistent way at a national scale. Applicable Forest Service and BLM land management plan direction constitutes current management direction for old growth and mature forests on individual management units. This definition and initial inventory effort does not change existing LMP management direction. (FS 1215a, April 2023).
Overstory Removal/Regeneration (I7-9)	Overstory removal promotes vigorous forest regeneration	Literature/science considered	The excerpt from the reference provided (Dombeck 2001) refers to commercial timber harvest, overstory removal, and the outcomes associated with the entire overstory removed. Overstory removal and total overstory removal are not proposed in this project. It is agreed that small diameter fuels and surface fuels are causing fire problems; treating these in this project is critical to meeting purpose and need. Prescribed burning and fuels reduction treatments are planned in this Project and both are needed to meet Purpose and Need, not solely commercial timber removal.
Past Management (I39-18)	The project description does not explain how different the proposed management is from past management and how future forest structure will be meaningfully different. Explicitly clarify.	Comment considered but no changes needed	The EA describes historic (past) management and the wildfire consequences of continuing management in the current state in the no action alternative. Post-treatment forest structure is described in section 2.1.3 Treatment Methods.
Forest Stand Baseline (I1-16, I1-17)	Lack of Forest Stand Baseline Condition Information and Site Specificity	Comment considered but no changes needed	The Protect Project does not state site specific baseline conditions. Instead, the Project states that "...exact location, extent, and sequence of treatment methods at individual sites would be based on site-specific characteristics and resource considerations." (EA, page 2-11)
Pre-Harvest Tree Distribution (I39-8)	There is no analysis on pre-harvest distribution of trees in the 30-inch diameter class or how many will be taken. There is no pre-harvest or post-harvest information on tree diameter distribution.	Comment considered but no changes needed	There will be no live trees removed that are 30.0 inches or greater except for safety or operability. The commentor is correct, there was no pre- or post-harvest diameter distribution analyzed. However, this was not a metric needed for decision, nor is it needed to demonstrate achievement of the purpose and need.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Prescribed Fire (I4-4)	Support for prescribed burning post-thinning operation	Comment considered but no changes needed	Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned. Prescribed fire treatment will be done in tandem with manual and mechanical treatments depending on the conditions, as explained further in Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire.
Prescribed Fire (I2-4)	Support for prescribed fire	Comment considered but no changes needed	Thank you for your support of prescribed fire as a treatment method for this project. Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned (Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire).
Prescribed Fire, communities (I3-10)	Support for prescribed fire versus mechanical or manual treatments	Comment considered but no changes needed	Thank you for your support of prescribed fire as a treatment method for this project. Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned (Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire). Design Feature FF-1 (Appendix A) requires all prescribed fire to be implemented with a prescribed fire plan. Additionally, prescribed fire would only be ignited under conditions that are conducive to primarily low- to moderate-intensity surface fires.
Prescribed Fire (I1-3)	Expressing concern over lack of prescribed fire in the project	Comment considered but no changes needed	Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned (Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire).
Prescribed Fire and Specific Commitment (I1-34)	Prescribed fire and request for a specific commitment of acreage that will be treated	Comment considered but no changes needed	Prescribed fire implementation will be determined by on the ground conditions for safety and treatment effectiveness. Therefore, it is not possible to make an acreage commitment until on the ground conditions in treatment units are identified.
Prescribed Fire/Managed Fire Support (I2-4)	General support for prescribed and managed fire	Comment considered but no changes needed	Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned (Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire). Additionally, since this is primarily a WUI focused project it is not the appropriate location to manage wildfire for resource benefit.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Prescribed Fire/Thinning/Timing (I12-2)	Advocating for prescribed fire (or managed fire) following thinning and periodically afterward	Comment considered but no changes needed	Prescribed fire is planned for all units in all three alternatives except for Alternative 3 in Bucks Lake Wilderness where only pile burning is planned. Prescribed fire treatment will be done in tandem with manual and mechanical treatments depending on the conditions, as explained further in Section 2.1.3 Project Alternatives – Treatment Methods: Prescribed Fire. Additionally, section 2.1 states that recurring treatments could include prescribed fire followed several years later by another prescribed fire. Regarding managed fire, due to this project being primarily a WUI focused project it is not the appropriate location to focus efforts on managing wildfire for resource benefit.
Prescribed Fire (I34-4, I34-7)		Comment considered but no changes needed	The commentor asks if prescribed fire is planned as a follow up treatment to thinning. The Proposed Action states that it is. The proposed action clearly states the intention to use "...multiple different treatment methods intended to achieve desired conditions." (EA, Section 2.1.3. Treatment Methods, Pg 17). However, these points could be more clearly stated throughout the EA.
Post-fire Treatment (I31-9)	Concerns over treated areas that burned high severity - gave example of near Paradise and Greenville	Comment considered but no changes needed	The commentor cites examples of treated forest that burned at high severity in the Camp and Dixie fires as evidence against the actions proposed in this project. The first example is of heavily managed and clear-cut forests between the communities of Concow and Paradise. These treatments were done in response to high severity fire that burned in 2008 wildfires in the BTU Lightning Complex in that area between Concow and Paradise. This project proposes to reduce surface fuels and reestablish conifer forest in these areas to prevent future high severity wildfire and break the cycle of repetitive high severity fire that has been documented in scientific literature cited in this project. The second example is the area surrounding the community of Greenville. Treatments on Plumas National Forest lands completed under the Keddie Project were successful at moderating fire behavior upwind of Greenville in the Round Valley Reservoir area. The Dixie fire spotted over these treatments onto private lands that had not received surface fuel reduction treatments and regained intensity and momentum as it rolled into the community. This project proposes to increase the type of treatments that were successful in the face of the Dixie Fire in the Round Valley Reservoir area across the landscape. These treatments consisted of mechanical and hand thinning followed by prescribed fire.

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Pyrosilviculture model (I2-7)	Incorporate treatments consistent with pyrosilviculture model into planning document	Comment considered but no changes needed/Literature/science considered	North et al. (2021) discusses the concept of "pyrosilviculture" and how an all lands approach that integrates Rx fire and unplanned ignitions might achieve greater scale landscape restoration goals than looking at the different treatments with "silo" view. PROTECT is looking at all lands at a landscape scale. Add North et al. (2021) to Fuels, Fire, and Forest Resilience report, specifically in direct effects discussion of action alternatives. Add North et al. (2021) to Protect Project EA.
rSDI (A2-2)	rSDI and a project that implemented fuel treatments that were accomplished through "eastside" rules under the 2004 SNFPA Framework ROD; thank you for citing Low et al. 2023	Comment considered but no changes needed	Comment noted. Indeed, the Protect Project recognizes that current existing stand densities are much too high to be resilient in the face of impending wildfire and climate change. Existing green stands must be thinned to the lower rSDI levels described and echoed in North et al 2022 and Low et al 2023. Alternative 1 includes a Forest Plan Amendment so that these lower stand density goals can be achieved.
rSDI (I4-6)	Advocating and outlining best practices of SDI metrics and forest health.	Comment considered but no changes needed	Recommendations are consistent with proposed action in general forest stands. There are locations where commentor recommendations are precluded by operability and/or project design features.
rSDI (I1-10)	Proposed rSDI Thresholds Not Necessary to Improve Resiliency	Comment considered but no changes needed	Fire modeling virtually the same for Alt 1 and 2. The commenter states that the proposed rSDI thresholds are not required to improve resiliency because the results of FLMMAP are indistinguishable between the alternatives. However, this comment incorrectly implies that fire risk and hazard is the only concern for forest resiliency. The Protect Project EA states that the project intends to increase resiliency to "...environmental stressors, including drought, wildfire, insects, and diseases; and foster ecosystem capacity to adapt to future climate conditions", not just wildfire (EA, page 1-4). Therefore, the application of rSDI as a forest resiliency metric is appropriate.
rSDI (I1-9)	rSDI Threshold Not Based on Best Available Science	Literature/science considered/Analysis supplemented, improved, or modified	Different forest types and habitat types would have varying results with the application of rSDI because stand density would be measured relative to carrying capacity (EA, Figure 2-1). For example, white fir stands may have a maximum rSDI of 560 while eastside pine may have a theoretical maximum rSDI of 365. As a result, 25 percent rSDI in a white fir stand would be 140 while in an Eastside Pine stand it would be rSDI of 91. Depending upon the average stand dbh and trees per acre, average stand basal area would most likely be different, though both stands are at the same rSDI. Additional information on rSDI is provided in Appendix B.

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rSDI (I39-9)	The EA provides no spatially explicit information on initial rSDI within the project area. The only target given for this project is reducing the pre-project rSDI to about 25 percent.	Comment considered but no changes needed	The commentor is correct that there was no existing condition SDI analyzed for the project area. However, existing SDI is not a metric needed for decision, nor is it needed to support the achievement of the purpose and need. The target SDI was disclosed, and effects to TESP and other resources were analyzed at the target SDI.
rSDI (I39-10)	Methods for rSDI for treatment would have the biggest, fire resistant, overstory trees cut first which as the literature shows would actually worsen wildfire risk. References a paragraph from EA (Forest Service 2023).	Comment considered but no changes needed	The commentor is correct, SDI is a function of Trees per Acre and stem diameter, measured in QMD, and that to reduce SDI one needs to reduce trees per acre or QMD. However, the commentor infers the proposed action reduces the SDI by removing the largest trees in the stand. In the Treatment Methods, it is documented that the thinning is removing small trees and medium sized trees, leaving larger more fire resilient trees. It is also disclosed that thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions. Therefore, in contrast to the commentor's inference, the proposed action reduces trees per acre primarily in the smallest size classes which accelerates diameter growth (QMD) to reach a lower SDI.
rSDI (I39-13)	Reducing rSDI by reducing QMD by cutting down the largest trees would likely exacerbate future wildfire behavior, rather than reducing TPA from a smallest to largest framework which would have positive outcomes for wildfire risk mitigation.	Comment considered but no changes needed	In the Treatment Methods, it is disclosed that the thinning is focused on small trees and medium size trees, leaving larger more fire resilient trees. It is also disclosed in the EA that thinning treatments are intended to accelerate growth of mid-seral forests toward mature and late seral (large diameter) forest conditions. Therefore, it is documented that the proposed action reduces trees per acre primarily in the smallest size classes which accelerates diameter growth (QMD) to reach a lower SDI.
Salvage Logging (I7-8, I7-13)	Areas that are salvage logged burned more severely than unmanaged areas in past fires and does not decrease the risk of reburn	Comment considered but no changes needed	No salvage logging proposed, comment not relevant to project.

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Salvage Logging Effects (I7-10)	Reburn in post-fire log stands exhibit elevated rates of fire spread, fireline intensity, and soil heating impacts	Literature/science considered	The reference provided Donato et al. 2006 evaluates postfire salvage logging after the Biscuit fire. Logging techniques were hand felling and helicopter logging. In the proposed action the EA references aerial yarding which would not typically occur, although it could be used in limited circumstances in inaccessible locations. Typically helicopter logging only removes merchantable large trees and not the associated tops, limbs, and small diameter material that would contribute to the fuel loading conditions on the landscape. In this project, there is no planned salvage logging and most (likely all) tree removal would not be done by helicopter. Therefore, ground based systems are planned to remove more fuels via multiple pathways including biomass removal, fuel piling (hand or mechanical), pile burning, and prescribed burning. Therefore, effects would be different in a reburn environment than are described in the referenced literature.
Salvage Logging Effects (I7-16)	Post-fire logging affects ecosystems by spreading invasive species, killing seedlings, affects water quality, and adds to future fire risk	Literature/science considered	The references provided by the commentor (DellaSala 2013, DellaSala 2015) are letters from scientists to the president about postfire logging (2013, 2015) and clearcutting (2015). These letters are not peer-reviewed scientific literature however they do refer to scientific literature. The referenced literature disregards the purpose and need for removing snags from postfire areas in the Wildland Urban Interface in the project area. The purpose and need addresses the concerns arising "after a wildfire, high-severity burned areas with dead trees interspersed with human development pose a long-term hazard tree issue (Troy et al. 2022b); pose a snag threat to firefighters (Riley et al. 2022); and increase the potential for communities to be exposed to a more frequent, high-severity shrub fire regime over time as forests are converted to shrubs (Lyderson et al. 2019)." (EA 3.1.5). Removing snags in the postfire environment meets the purpose and need, whereas retaining snags in these locations near communities maintains unacceptable risk in the project area.
Scientific Validity (I35-12)	Questioning scientific validity of theories	Comment considered but no changes needed	While it is unclear what "USFS theories" the commentor may be referring to, all forest thinning activities proposed in the project are supported by the best available science. The combination of mechanical thinning followed by prescribed fire remains the most effective treatment for mitigating wildfire risk in Sierra Nevada forests.

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Suggested Treatment Methods (I3-4)	Diverse treatment prescription for resilient forest	Comment considered but no changes needed	Design features in the project area are intended to provide protection to sensitive natural and cultural resources. Lower impact treatments may be one approach used to achieve fuels reduction if that resource requires a lower impact approach to maintain those sensitive resources. Prescriptions will vary based on stand type. Within the same stand type, existing stand conditions vary, therefore post-treatment stand conditions will vary even with a similar treatment. Additionally, the treatment may vary as desired conditions may be able to be reached by multiple pathways. A combination of prescribed burning, hand, and mechanical treatments are planned, and the implementation of these varied treatments will achieve a diverse and resilient outcome.
Suggested Treatment Methods (A2-5)	Comment suggests consulting Moore et al. 2021 for fuel management activities to be implemented in previously burned high severity fire environments. Restoration that combined, mechanical, prescribed fire, and herbicide treatments were utilized and assessed in this paper.	Literature/science considered	Thank you for providing the research citation to support activities in burned areas. Project activities under Alternatives 1 and 2, and to a lesser extent under Alternative 3 would include implementing mechanical, prescribed fire, and herbicide application in burned areas within the Project area.
Suggested Treatment Methods (I7-4)	Tree removal is not necessary prior to conducting prescribed fire.	Comment considered but no changes needed	The EA does not make this claim. Thinning can increase the window of opportunity to use prescribed fire, however, it is known that tree removal is not required before prescribed fire can be used.
Suggested Treatment Methods (I11-2)	Recommends thinning one-third of trees.	Comment considered but no changes needed	Comment is supportive of thinning forests to "about 1/3 of their current density". Alternative 1 should roughly approximate this approach in most areas.
Suggested Treatment Methods (I14-2)	Advocating for Removing dead and dying trees and forest debris.	Comment considered but no changes needed	The proposed action includes the removal of biomass through mechanical/hand thinning and the use of prescribed fire.
Suggested Treatment Methods (I32-7)	Suggested Treatment Methods.	Comment considered but no changes needed	Comments are opinion based and not backed up by any scientific reference. Hand thinning as the only course of treatment has proved to be empirically ineffective in many instances to achieve stand density goals that lead to desired fuels conditions after the application of prescribed fire. Hand thin only treatments also have a shorter period of effectiveness before retreatment is necessary increasing the need and cost of maintenance. Future climate scenarios suggest that without a significant reduction in trees per acre and stand density, we will not accomplish resilience and climate adaptation goals of the project with hand thinning alone.

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Suggested Treatment Methods (I39-2)	Sierra forests, old and young growth reserves, and thin from below treatments are more effective at preventing tree mortality (references Stephens and Moghaddas, 2005 and Nakamura 2004).	Literature/science considered	Concur with the commentor, the proposed actions will remove surface fuels and biomass/small trees, and intermediate trees. This is consistent with the citation provided. The proposed action is not an overstory removal treatment.
Suggested Treatment Methods (I39-14)	Surface fuels treatment, reduction of ladder fuels through small understory thinning, followed or coupled with prescribed fire offers the greatest benefit to the forest in terms of protection from wildfire. (References Agee et al. 2000)	Comment considered but no changes needed	Surface treatment with prescribed fire is a key component of the proposed action.
Suggested Treatment Methods (I39-15)	Reducing crown bulk density does not in and of itself mean removal of the largest overstory trees, removing small diameter, but tall spindly trees reaching up into the canopy is sufficient for achieving that purpose, not nearly as important as treating surface and ladder fuels.	Comment considered but no changes needed	Agreed. The proposed action describes a thin from below approach, removing small and intermediate trees first to meet desired conditions.
Sustainable Management (I28-2)	Sustainable Forest Management Practices	Comment considered but no changes needed	Proposed actions result in more resilient forests, designed to maintain function after disturbance. Proposed actions include biomass utilization where feasible; reforestation is proposed in burned areas.
Thinning Effects (I7-25)	Commercial thinning associated with higher tree mortality - kills more trees than prevents from being killed	Comment considered but no changes needed	References cited for cumulative mortality (Hanson 2022; Baker and Hanson 2022) document higher total cumulative mortality in commercial thin units when considering effects of both tree removal from thinning and fire effects. What is not mentioned in that study, however, is the retained live tree species, size, structure, and composition after comparing burned thinned and unthinned stands. It is important to disclose what the remaining forest looks like post-fire, not just describe loss in terms of percent cumulative mortality. The simple contrast of a fire burning through an unthinned stand vs. a thinned stand doesn't adequately describe the remnant structure, tree size, tree composition, snag composition, and more importantly how the remaining trees and forest meets habitat and fuels goals in future wildfire scenarios. Therefore, it is not accurate to extrapolate on this information and make inferences about how effective these actions are on mitigating the wildfire crisis.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Thinning Effects (I7-21)	Thinning removes fire resistant trees that are needed for forest resilience, alters the forest's microclimate, resulting in higher intensity fires	Literature/science considered	The reference provided is a letter from scientists opposing the Infrastructure Bill, but it is not peer-reviewed scientific literature. However, it does refer to scientific literature. Thinning proposed in this project will preferentially retain fire resistant, shade intolerant species (EA 2.1.3). There is no correlation between thinned forests being drier, windier, and causing more severe fires. Estes (2012) found that overall, even when fuel moisture varied between treatments, differences were small. The long nearly precipitation-free summers in northern California appear to have a much larger effect on fuel moisture than the amount of canopy cover. Fuel moisture differences resulting from stand thinning would therefore not be expected to substantially influence fire behavior and effects during times of highest fire danger in this environment. Additionally, Hardage (2022) found that in dry years, thinned stands had significantly higher soil moisture later in the summer compared to the untreated control. In contrast, soils in the control dried out much earlier in the season. This suggests that trees in the thinned stands would be much less drought stressed. It also suggests that delaying the onset of soil moisture recession could reduce the risk of wildfire.
Thinning/Logging Impacts (I39-3, I39-4)	Forest thinning increased in-forest wind speeds capable of carrying wildfire through the crowns despite crown thinning and fire moved faster through thinned, dry forest. Logging intensity is the second most important predictor of wildfire intensity, surpassed by weather and drought conditions. Fires burn with less intensity on lands that have the highest protections from logging. (References Banerjee et al. 2020, Zald and Dunn 2018, Bradley et al. 2016).	Literature/science considered	This comment focuses on a portion of the findings of Banerjee 2020, which found that while a low degree of thinning can indeed increase fire intensity, a higher degree of thinning was effective in reducing fire intensity. The commentor focuses on increased wind speeds associated with a higher degree of thinning, however, the study concluded that increased wind speed alone did not result in increased fire intensity. The conclusions for this paper also state explicitly that "...thinning combined with prescribed fires is highly likely to reduce fire severity in coniferous forests...", which is in direct support of the proposed action for this Project.
Thinning Treatment (I13-2)	Support for the thinning of small and intermediate-sized trees, use of prescribed fire	Comment considered but no changes needed	All three action alternatives analyze this approach to different degrees of intensity. Mechanical thinning is proposed to "thin-from-below" removing primarily smaller trees and intermediate trees to meet desired stand density.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Thinning Treatment (I7-11)	Combined mortality is higher in thinned areas	Literature/science considered	References cited for cumulative mortality from Hanson and Odion 2006 documents higher total cumulative mortality in commercial thin units when considering effects of both tree removal from thinning and fire effects. What is not mentioned, however, is the retained live tree species, size, structure, and composition after comparing burned thinned and unthinned stands. It is important to disclose what the remaining forest looks like post-fire, not just describe loss in terms of percent mortality. The simple contrast of a fire burning through an unthinned stand vs. a thinned stand doesn't adequately describe the remnant structure, tree size, tree composition, snag composition, and more importantly how the remaining trees and forest meets habitat and fuels goals in future wildfire scenarios. Additionally, Hanson and Odion 2006 has a small sample size and caution should be used in generalizing results (Steel, Safford, and Viers 2015).
Treatment Cycle (I4-5)	Advocating for 20-year treatment/entry cycle	Comment considered but no changes needed	Comment supports Alternative 1. Current agency guidance on treatment intensity suggests designing silvicultural treatments to be effective for 30 years, which is in line with the recommendation of the commentor (at least 20 years).
Treatment Impacts (I32-4)	Ecosystem Degradation from treatment methods; methods proposed by the project (particularly in alternatives 1 and 2) would cause irreparable damage not only to these species, but the ecosystem. Treatments are ineffective	Literature/science considered	There is not a correlation between thinned forests being drier, windier and more severe fires that spread more rapidly, as is alluded to in the Baker and Hanson reference. Estes (2012) found that overall, even when fuel moisture varied between treatments, differences were small. The long nearly precipitation-free summers in northern California appear to have a much larger effect on fuel moisture than the amount of canopy cover. Fuel moisture differences resulting from stand thinning would therefore not be expected to substantially influence fire behavior and effects during times of highest fire danger in this environment. Reference cited for cumulative mortality from the Caldor Fire (Baker and Hansen 2022) documents higher total cumulative mortality in commercial thin units when considering effects of both tree removal from thinning and fire effects. What is not mentioned in that study, however, is the retained live tree species, size, structure, and composition after comparing burned thinned and unthinned stands. There is also no mention of thinning prescription basal area target, diameter limits, or monitoring stand structure post-harvest. It is important to disclose what the remaining forest looks like post-fire, not just describe loss in terms of percent mortality. The simple contrast of a fire burning through an unthinned stand vs. a thinned stand doesn't adequately describe the remnant structure, tree size, tree composition, snag composition, and more importantly how the remaining trees and forest meets habitat and fuels goals in future wildfire scenarios. Therefore, it is not accurate to conclude that thinning will harm the forest overall and increase the

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
			<p>severity and danger of wildfires when they occur. Regarding concerns of microclimate in Strawberry Valley and thinning contributing to drier stand conditions, Hardage (2022) found that in dry years, thinned stands had significantly higher soil moisture later in the summer compared to the untreated control. In contrast, soils in the control dried out much earlier in the season. This suggests that trees in the thinned stands would be much less drought stressed. It also suggests that delaying the onset of soil moisture recession could reduce the risk of wildfire.</p>
<p>Tree Removal/Effects (17-19, 17-22)</p>	<p>When more trees and biomass are removed from forests it causes higher fire severity in subsequent fires, hotter and drier forests, and windier microclimates; older and denser forests had lower fire severity</p>	<p>Literature/science considered</p>	<p>The reference provided Lesmeister (2021) refers to a study that occurs in the Siskiyou/Klamath ecosystem. The climactic conditions are different and therefore results do not apply in this project area. Dunn et al. (2020) is also not relevant to this project. The study examines Douglas fir/hemlock forests in the western Cascades which are different species and climactic conditions than in the project area. In the Central West Slopes project area, modeling has shown that the alternatives that remove the most trees will have corresponding fire effects that should result in lower severity effects than those alternatives that remove less material. Additionally, there is no correlation between thinned forests being drier, windier and more severe fires. Estes (2012) found that overall, even when fuel moisture varied between treatments, differences were small. The long nearly precipitation-free summers in northern California appear to have a much larger effect on fuel moisture than the amount of canopy cover. Fuel moisture differences resulting from stand thinning would therefore not be expected to substantially influence fire behavior and effects during times of highest fire danger in this environment. Additionally, Hardage (2022) found that in dry years, thinned stands had significantly higher soil moisture later in the summer compared to the untreated control. In contrast, soils in the control dried out much earlier in the season. This suggests that trees in the thinned stands would be much less drought stressed. It also suggests that delaying the onset of soil moisture recession could reduce the risk of wildfire.</p> <p>In this project area the Alternative 3 and no action was modeled. Both alternative 3 (hand thin except for WUI defense) and the no action can be compared to higher density retention as is described in the comment. In the no action, 67 percent of fire class is modeled to be torching or crown fire in 98th percentile weather, and in Alternative 3, 44 percent of fire class is modeled to be torching or crown fire in 98th percentile weather. In contrast, Alternatives 1 and 2 include mechanical thinning and lower subsequent density and modeling demonstrates a total of 8 percent of torching and crown fire at 98th percentile weather. Torching and crown fire are directly related to fire severity (percent of basal area burned)</p>

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
			therefore the alternatives with the most removal would also result in the lowest severity effects in the project area.
Tree Removal (I39-12)	Project documentation is vague and unclear on which trees will be removed this the project will have vague and uncertain outcomes.	Comment considered but no changes needed	The project documents Treatment Methods that thinning the small and medium-sized trees and retaining shade-intolerant fire-resistant species to a target SDI. It is not needed for decision what is being removed, only the conditions that remain and how the different alternatives meet the purpose and need, which has been analyzed.
White Fir (I8A2-15)	White fir is favored for removal but the EA does not acknowledge the fact that logging will exacerbate the regeneration of white fir.	Comment considered but no changes needed	The EA states that in general, tree removal will target white fir first. Figure 7, presented by the commenter as evidence, is pre-implementation before biomass size trees are removed. Additionally, the EA states that multiple different treatment methods could apply to an individual planning unit to achieve desired objectives, including the use of prescribed fire (EA, page 2-3)
Herbicides			
Worker Safety (I31-19, I32-5, I3-8, I39-23, I22-11, I21-3, I13-1)	Concerns regarding worker, public, and ecological exposure to herbicides	Comment considered but no changes needed	Herbicides included in the action alternatives are approved and regulated by the US EPA and California Department of Pesticide Regulation (DPR). Product labels and DPR specify use restrictions and personal protection equipment required to reduce risks to humans and the environment. The Forest Service has developed further Design Features (Appendix A) to reduce risks to humans and the environment. Appendix G analyzes potential risks to human health from proposed herbicide use. Potential effects from the proposed use of herbicides are analyzed in each resource area in the EA. Several commentors raise concerns over the potential use of herbicides on over 200,000 acres. Internal discussions between Ryan Bauer, Kristin Winford and Jim Belsher refine the estimated acreage to approximately 50,000 acres without constraining the original intended uses for shrub control during reforestation of burned areas (31,478 acres), control of invasive plant species (approximately 2,000 acres), maintenance of permanent fire lines (4,902 acres), and control of shrubs in early seral stands including maintenance of lower elevation west slope fuel breaks dominated in which tanoak is prevalent (11, 435 acres). This estimate is in line with our socioeconomic estimates in (EA tables 3.8-1 and 3.8-2).
Oversight (A1-8)	Periodic Review of Registered Chemicals	Comment considered but no changes needed	Herbicides considered for use are reviewed yearly to ensure current compliance with product labels and California Department of Pesticide Regulation requirements.
Aerial application (I3-7)	Comment objects to the use of aerial herbicide application	Comment considered but no changes needed	Aerial application of herbicides is not proposed under any action alternative.

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Hydrology and Soils			
Cumulative (I1-19)	Cumulative Watershed Effects	Analysis supplemented, improved, or modified	Request for additional discussion about specific conditions and development of design criteria. Language has been added to the EA hydro report.
Forest Health and Fuel Reduction Projects (I8A1-13)	Forest Health and Fuel Reduction projects severely affect water quality by compaction, churning up the entire topsoil layer, and removal of most mature trees that would protect the soil from weather.	Comment considered but no changes needed	Best Management Practice (BMP) monitoring contradicts claims made by this comment (I8A1-13)
Water Quality (I30-7)	Forest canopy protects water – thinning projects on top of past fire threatens health of watershed	Comment considered but no changes needed	The EA considers the effects of treatment on hydrological resources in Section 3.4 Hydrology and Soils. The comment does not indicate that this analysis is incorrect or incomplete. In addition, the EA includes Design Features HYD-1 through HYD-37, which protect Hydrology, Soil, and Aquatic Resources.
Soils (I17-3)	Comment expresses concern about effective ground cover following treatment.	Comment considered but no changes needed	Effects on soil resources from implementation of the action alternatives are evaluated in Chapter 3, Section 3.4, "Hydrology and Soil Resources," of the EA (pgs. 3.4-10—3.4-22). The section extensively references protective design features that are included as a part of the action alternatives, as applicable. These include standard protective measures identified in the Forest Service Region 5 Soil and Water Quality Handbook, and additional project-specific measures identified in the design features listed in Appendix A of the EA.
Soils (I17-4)	Comment expresses concern regarding treatments on steep slopes.	Comment considered but no changes needed	The Project incorporates design features related to treatment activities on slopes; these are listed in Appendix A of the EA.
RCAs (I1-30, I1-31)	Concern with RCA analysis and SNFPA compliance.	Comment considered but no changes needed	A discussion of project effects to RCAs is included in the Environmental Assessment (EA, pages 3.4-8 - 3.4-22). The types of RCAs and associated buffers are provided in the EA (EA, page 3.4-2). Design features have been developed to prevent impacts to RCAs (EA, Appendix A, pages A-12 - A-17). Design features provide equipment exclusion zones that vary in width based on RCA type, slope and treatment (EA, Appendix A, page A-16). A discussion of how aquatic Riparian Conservation Objectives could be affected by the proposed action has been added to the project record.
RCAs (I1-32)	Address how treatments are consistent with riparian conservation objectives for shade and thermal protection within the RCA		A discussion of how aquatic RCA objectives will be affected by the proposed action has been added to the project record in Appendix F of the EA. This discussion includes information on how the proposed action addresses thermal protection in RCAs.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
NEPA Process/Planning			
Impressions of Forest Service (I35-14)	Impressions of Forest Service then and now	Other	Commentor requests that the Forest Service start over with a new project plan based on Earth ethos. This is a closing remark from a letter that includes some specific comments and some comments that are beyond the scope of the project.
Emergency Authorization (I1-7, I8-8, I8-9, I8-10, I8-19, I8-23, I8-24, I9-8, I25-2)	Comments object to the use of an EAD.	Comment considered but no changes needed	The Secretary of Agriculture has directed the Forest Service to us and prioritize all available resources and authorities to expedite actions to reduce wildfire threats to communities, critical infrastructure, public health and safety and natural resources. Section 40807 of the Bipartisan Infrastructure Law authorizes the Secretary to determine that an emergency exists where implementation of emergency actions is necessary to achieve relief from hazards threatening human health and safety or mitigate threats to natural resources on National Forest System land. Based on risks identified, the Secretary has identified that an emergency exists on the Plumas National Forest. Within the designated emergency areas, the Secretary has authority to approve emergency actions for which NEPA compliance is not subject to administrative review under 36 Code of Federal Regulations (CFR) 218. Treatments included in the Decision Notice associated with the emergency action for this Project will be directly related to community protection and/or critical infrastructure.
Forest Plan Amendment (I2-9)	Discussion of Forest Plan Amendment and timeline of project	Comment considered but no changes needed	The selection of Alternative 1, which includes the Forest Plan amendment, or any alternative would be carried out under the same administrative timeline. Activities associated with or permitted by the Forest Plan amendment included in Alternative 1 were evaluated in the EA at the same level of detail as the other alternatives. The Forest Service may elect to authorize some activities not associated with the Forest Plan amendment as a part of the Emergency Authorization Declaration, but this decision would be carried out irrespective of the administrative timeline for including a Forest Plan amendment and would not affect the schedule of activities authorized under the EAD.
Planning Rule (I1-6, I1-14)	Significant loss of habitat jeopardizes persistence of mature forest species and threatens viability, contrary to requirements of 2012 planning rule (26 CRR 219) and the National Forest Management Act.	Comment considered but no changes needed	Changes will be reflected in the DN for the G to Z portion of the project. 5M habitat will be retained as 5M. 5D would be retained as 5D within CSO PACs and HRCAs and goshawk PACs -- outside of these areas, 5D areas would be reduced to 5M with a minimum of 50% CC

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Planning Rule (I1-8)	rSDI Threshold Is Inconsistent with NFMA	Comment considered but no changes needed	It is not clear by the commenter how this project violates NFMA, as this comment is unsubstantiated. The project is using the latest available science to guide the Forest Plan amendment to formally adopt new standards and guidelines that are consistent with the current state of scientific research for forest management.
Project Area (I8-11)	Due to the "highly disparate nature of the community zones, the project should be broken into three separate projects, analyzed by the ranger districts		Describe process for identifying community zones. Its acceptable to include community zones across three districts into one project and alleviates the perception of segmentation.
Scoping (I3-5)	Concurrence with relevant issues during scoping process	Comment considered but no changes needed	The commenter’s concurrence of relevant issues in the scoping process has been noted.
Scoping (I8A1-9)	Data from field assessments used to develop the Purpose and Need and Proposed Action were not made available to the public during scoping.	Comment considered but no changes needed	All data and materials used to develop the action alternatives are available in the project record.
Conditions-based Management (I8-12, I9-2, I9-3, I9-4, I9-7)	Conditions-based management leaves out details, details are deliberately withheld from the public, and the public is not notified of the exact treatment in a specific location. Reduces ability for public understanding of Project specifics. Additionally, it put the decision before the information gathering phase. Analysis conducted without on-the-ground information.	Comment considered but no changes needed	<p>Conditions-based management is a management approach which supports responsiveness and flexibility between planning and implementation in natural resource management. Condition-based management allows for proposed treatments to be aligned—post-decision but prior to implementation—with current conditions on the ground. It does this by focusing on collecting the right data at the right time for the right activity to meet the land management decision.</p> <p>Conditions-based management has therefore been identified as the best strategy to implement near-term actions whose consequences are known with a high degree of specificity (e.g., in areas where field data has been collected for the presence/absence of species) while delaying middle- and longer-term activities in areas where less is known, or when the outcomes of treatments are not as well predicted.</p> <p>Condition based analysis do not change the required public involvement periods identified in 36 CFR 218 regulations.</p>
Request to Prepare an EIS (I7-1, I7-2, I7-34, I35-2, I-35-8, I8-13, I8A1-2, I8A1-6, I8A1-8, I8A2-1, I1-35, I1-5)	Comments suggest that the scope and scale of the project, and the potential for significant effects require an EIS.	Comment considered but no changes needed	As directed at 40 CFR 1501.4(a), “An agency shall prepare an environmental assessment for a proposed action that is not likely to have significant effects or when the significance of the effects is unknown.”

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Approval Authority (I9-5)	The project gives the Forest Supervisor the sole authority to determine treatments on too large a portion of the landscape. This gives the Forest Supervisor legal authority to ignore scientist opinion	Comment considered but no changes needed	The decision properly lies with the Forest Supervisor given their delegation of authority per the FSM 2400. Consideration of best available science is a standard the Forest Service incorporated into their project planning processes.
Programmatic NEPA (A1-2)	Request for programmatic NEPA review.	Comment considered but no changes needed	A Forest Plan (in this case, amendment) is similar to programmatic NEPA in that the document gives overarching direction. Unlike a Forest Plan amendment, however, programmatic NEPA provides no site-specific, conditions-based management, or other project-specific analysis.
Public Involvement (I5-1; I5-3, I5-3, I5-5, I15-2, I8-2, I8-3, I8-5, I8-16, I8-25, I8A1-1, I14-4, I20-9, I34-1)	Comments raise concern that the public notice period was too short. Requests to extend public comment or other parts of the NEPA process; request for more opportunity for public input.	Comment considered but no changes needed	Timeframes for public involvement are identified at 36 CFR 218. Comment periods cannot be extended; however, the Reviewing Official reserves the right to extend the objection resolution period.
Public Involvement (I6-13)	Request for communication with PCT staff on timing and implementation	Comment considered but no changes needed	The Forest Service will coordinate and communicate with the Pacific Crest Trail Association on the timing and implementation of planned activities relating to project implementation.
Public Involvement (I15-9)	Concerns that USFS will not listen to the public.	Comment considered but no changes needed	Thank you for expressing your concerns. Changes were made to the project's design based on comments received from the public during scoping. Additional changes and clarifications have been made to the EA based on input received from the public and the EPA during the comment period.
Public Involvement (I8-4, I8-30, I8A1-4, I8A1-5)	Request for site visit/meeting	Comment considered but no changes needed	The Forest Service will reach out to the commenter to discuss comments and arrange a site visit.
Re-initiate NEPA (I8-7)	Request to restart NEPA for the Project.	Comment considered but no changes needed	Public involvement opportunities adhered to the 36 CFR 218 regulations. The Forest mailed out more than 300 letters noticing scoping, and even more were mailed noticing the EA. The Forest Service published legal notices in the newspaper of record, and accepted comments and participation from all public individuals and entities.
Project Scope	Request to partition the Project area into smaller projects for evaluation under separate NEPA processes.	Comment considered but no changes needed	It is acceptable to include community protection zones across three districts into one project to reduce the perception of project piecemealing.

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Implementation Schedule (I9-6, A1-3)	The project would take too long to implement (no implementation date identified). If conditions change before implementation is complete there won't be any requirement to notify the public of the changed conditions. This gives the Forest Supervisor too much authority.	Comment considered but no changes needed	The Forest Service expects to implement this project over a minimum 10-year timeline based on the Forest Service Chief's Wildfire Crisis Strategy. If there are changed circumstances or new information that occur or arise during project implementation, these conditions would trigger review by the Line Officer.
Proposed Action/Alternatives			
Alternatives (I8-26, I8-29, I8A1-3, I8A2-3, I8A1-17, I8A1-18, I25-3)	Comments suggest that the Forest Service consider including and analyzing a hand thin/prescribed burn-only alternative.	Additional alternatives developed and evaluated	A hand thin/prescribed burn-only alternative would not meet the Purpose and Need for the project. This alternative has been considered and dismissed from further analysis (Final EA, Chapter 2, "Project pg. 2-30)
Alternatives (I8-14)	The alternatives in the EA differ from the proposed action presented during scoping, specifically the addition of "vegetation treatments" in the EA versus "fuels treatments" during scoping.	Comment considered but no changes needed	In the context of the Project, "vegetation treatments" are synonymous with "fuels treatments," in that the intent is to reduce fuels loads (vegetation) on the landscape to meet the Purpose and Need of the Project.
Herbicide Treatment Area (I1-28)	Limit herbicide use to directly adjacent to homes and infrastructure	Proposed action modified	<p>Several commentors raised concerns over the potential use of herbicides on over 200,000 acres of the Project area. Internal discussions among the Plumas National Forest planning team refined the estimated total acreage to approximately 49,815 acres without constraining the original intended uses for shrub control during reforestation of burned areas (31,478 acres), control of invasive plant species (approximately 2,000 acres), maintenance of permanent fire lines (4,902 acres), and control of shrubs in early seral stands including maintenance of lower elevation west slope fuel breaks dominated in which tanoak is prevalent (11,435 acres). This estimate is in line with our socioeconomic estimates in Tables 3.8-1 and 3.8-2 of the EA.</p> <p>Further, the practical number of acres that could be treated each year would be more on the order of 10,000 acres. Considering that the environmental degradation time for herbicides proposed for use is on the order of days or weeks, there would not be a substantial quantity of herbicide in the Project area at any given time because of the lack of environmental persistence.</p> <p>In response to this comment and other, similar comments, edits have been made to the action alternatives in Chapter 2, "Project Alternatives," of the Final EA (pgs. 2-28 and 2-29).</p>

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Herbicide (I20-10)	Implementation, Acreage Summaries, Post-Application Monitoring		The minimum standard for post-treatment evaluations is a qualitative estimate of the effectiveness of the treatment for a specified target pest (FSH 2109.14). For Invasive species, at least 50 percent of sites are monitored for treatment effectiveness. Competing vegetation and herbicide treatment effectiveness will be assessed during first- and third-year stocking and/or survival surveys.
Home hardening and defensible space (I17-3, I15-3, I17-1, I17-6, I21-2, I22-6, I25-4 I31-2, I31-7, I31-8, I32-8, I34-5, I34-8, I39-17)	Opposition/concerns regarding the Project and/or advocacy for the project to focus on home hardening and implementation of defensible space.	Comment considered but no changes needed	The action alternatives as described in Chapter 2 of the EA meet the purpose and need for the proposed action, as defined in Chapter 1 of the EA on pages 1-3 and 1-4. Home hardening and defensible space on private property are important tools for wildfire resilience but are not within the scope of this project. This project focuses on reducing wildfire hazards on National Forest System lands near communities. The Forest Service does not have jurisdiction to require or implement home hardening or defensible space treatments on private land. California Public Resource Code Section 4291 already requires that private property owners implement defensible space treatment on their properties. The California Governor’s Office of Emergency Services and CAL FIRE oversee a Home Hardening Program encourages cost-effective wildfire resilience measures to create fire-resistant homes, businesses, public buildings, and public spaces. Direct support in achieving defensible space and home hardening is provided to homeowners by local fire protection districts, resource conservation districts, and other organizations.
Project Opposition (I22-10, I35-15)	Opposition to general approach of treatments	Comment considered but no changes needed	The comment is hyperbolic and does not identify specific issues related to the adequacy, accuracy, or completeness of the EA.
Project Opposition (I22-1, I32-1, I32-9, I35-4)	Opposition to project/concern of impacts	Comment considered but no changes needed	The action alternatives as described in Chapter 2 of the EA meet the purpose and need for the proposed action, as defined in Chapter 1 of the EA on pages 1-3 and 1-4. This comment in opposition of the project was considered by the responsible official.

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Project Opposition (I27-1)	Opposition to widespread removal of trees	Comment considered but no changes needed	It is disclosed in the EA that there will be tree removal using mechanical equipment in 2.1.3 Treatment Methods section, but to achieve the purpose and need of reducing fuels and decrease potential for extreme fire behavior, rather than solely for logging. It is acknowledged that trees provide shade, wind protection, erosion control, and carbon offsetting. It is for these reasons and more that this project is being planned, to address the purpose and need of reducing fuels and decrease potential for extreme fire behavior to help keep the forest healthy and able to provide those services. Additionally, no proposal to remove 90 percent of the trees has occurred, as is suggested. The EA Section 2 Project Alternatives lays out the plan for the project. Moreover, it is disclosed in the EA that there will be tree removal using mechanical equipment in 2.1.3 Treatment Methods section, but to achieve the purpose and need of reducing fuels and decrease potential for extreme fire behavior, rather than solely for logging. The suite of treatments also includes hand thinning and prescribed fire.
Opposition to Alternatives 2 and 3 (I40-7)	Alternatives 2 and 3 will fall short of Purpose and Need for project. Maintaining basal area and canopy cover greater than 40 percent will result in increased risk of loss from fire and drought mortality.	Comment considered but no changes needed	It is true that Alternatives 2 and 3 do not meet desired conditions outside of WUI Defense Zones to the same extent that Alternative 1 does. Alternatives 1, 2, and 3 all meet the Purpose and Need for the project to varying degrees.
Project Support (I20-4)	Supportive, proposes possible partnership with community-based fire practitioners.	Comment considered but no changes needed	The Plumas National Forest is committed to developing our relationship with community-based prescribed fire practitioners. We continue to support TREX events in Plumas and Butte Counties and look forward to expanding cooperation as the experience and capacity of our partners continues to grow.
Project Support (I2-1, I2-12, I2-13, I3-1, I11-1, I14-1, I14-7, I16-1, I18-1, I19-1, I24-1, I26-1, I29-2)	Multiple comments express general support for the project	Comment considered but no changes needed	Thank you for your comment and support.
Support for Alternative 1 (I3-19; I25-2; I4-3; I6-5; I6-10)	Support for Alternative 1	Comment considered but no changes needed	Thank you for your comment and support for Alternative 1. It has been considered by the Responsible Official.
Support for Alternative 1 and Forest Plan Amendment (I40-6)	Support Alternative 1 and included project specific Forest Plan Amendment. Will result in greatest reduction in stand densities through combination of mechanical thinning and Rx fire treatments.	Comment considered but no changes needed	Thank you for your comment and support for Alternative 1. It has been considered by the Responsible Official.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Support for Alternative 2 (I12-1)	Support for Alternative 2	Comment considered but no changes needed	Thank you for your comment and support for Alternative 2. It has been considered by the Responsible Official.
Support for the No Action Alternative (I35-1; I38-1)	Support for No Action Alternative	Comment considered but no changes needed	Thank you for your comment and support for the No Action Alternative. It has been considered by the Responsible Official.
Support for Road Maintenance	Comment supports maintaining roads to standards.	Comment considered but no changes needed	Thank you for your comment of support. It has been considered by the Responsible Official.
Proposed Action/Environmental Setting/Environmental Analysis (I1-1)	Insufficient Environmental Setting, Proposed Action, and Resource Analysis	Comment considered but no changes needed	The comment prefaces later issues raised in the comment letter. See remarks for comments I1-15, I1-16, I1-17, I1-18, I1-19, I1-21, I1-22, I1-23, I1-24, I1-25, I1-26, I1-27, I1-30, I1-31, I1-32, and I1-33.
Alternatives (I2-10)	Unclear why fewer acres available for treatment in Alt 1 compared to Alt 2	Comment considered but no changes needed	Differences in the planning units which would receive mechanical treatment under Alternatives 1 and 2 account for this discrepancy. While Table 2-3, “Treatment Methods Allowed in Each Planning Unit under Alternatives 1 and 2” (EA pg. 2-12) shows that the same planning units could receive the same treatments under each of these alternatives, generally, Alternative 1 reserves portions of the Wild and Scenic Rivers designated areas, as noted in the proposed Forest Plan amendment in Appendix C, “Retain at least 40 percent canopy cover in the following land allocations: California Spotted Owl and Northern Goshawk PACs, California Spotted Owl HRCAs, and Feather River Wild and Scenic designated and eligible areas” (EA, Appendix C, pg. C-19). Overall, however, Alternative 1 would treat to a higher rSDI than Alternative 2 and would therefore meet the Purpose and Need of the project more effectively.
Alternatives (I3-3)	Project urgency must be balanced with protection of natural and cultural values	Comment considered but no changes needed	The Project alternatives evaluated in the EA all meet the Purpose and Need for the Project to varying degrees. Critically needed actions associated with the Project to meet the Purpose and Need, especially those that would immediately reduce risk of wildfire impacts on communities and critical infrastructure and reduce the potential for extreme fire behavior in the wildland-urban interface, while balancing forest health, would be approved under an Emergency Authorization Declaration through this environmental review process. Impacts on affected resources have been evaluated in Chapter 3 of the Draft EA.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Alternatives and Scoping (I8-1, I8-15, I8-6, I8A1-7)	Comments express concern regarding the proposal that was scoped and the action alternatives that were carried forward into analysis in the EA.	Comment considered but no changes needed	Plumas National Forest used internal and external scoping to refine and establish a range of alternatives that meet the Purpose and Need for the Project, and carried those forward for evaluation in the EA.
Alternatives (I22-12; I22-3)	Comment provides recommendations for treatment activities.	Comment considered but no changes needed	The activities included in the action alternatives meet the Purpose and Need for action. Prescribed fire in the form of underburning to eliminate ladder fuels and other forms of mechanical and manual treatments to reduce ladder fuels are proposed under the action alternatives.
Alternatives (I37-10)	Comment suggests reconsidering treatment approaches in western slope communities	Comment considered but no changes needed	The activities included in the action alternatives meet the Purpose and Need for action.
Design Features/Alternatives (I14-3)	Comment advocates for protection of old growth, riparian areas, archeological sites, and maintained roadways	Comment considered but no changes needed	Design features related to late seral habitat, riparian areas, and cultural resources are included in Appendix A of the EA. Activities related to roads are described in Chapter 2, "Project Description," of the EA (pgs. 2.7 and 2.8).
Support for Hand Thin/Prescribed Burn-Only Alternative (I8A1-10)	Absent data to the contrary, the commenter believes that the conditions in the project area already meet desired conditions and a hand thin/underburn alternative should be the preferred alternative. Commenter says logging at any level reduces forest health and fire resilience. They have submitted photos, personal studies, comments, etc. that have all been generally dismissed.	Comment considered but no changes needed	This comment is conjectural in nature without any factual evidence. The commenter "believes" that project already meets desired conditions. Alternative 3 analyzes hand thinning and prescribed burning only, outside of the WUI defense zone. Additionally, the Protect Project Fuels report in the EA clearly shows and concludes that Alternative 3 is much less effective at reducing fire intensity as compared to Alternative 1 and 2 (EA, pages 3.1-21 to 3.1-24).
Recreation and Visual			
Design Features (I6-5; I6-11; I6-12; I6-14)	Support for and explanation of specific design features related to recreation and public use within portions of the Project area adjacent to the Pacific Rim Trail	Proposed action modified	The analysis provided in Chapter 3, Section 3.5, "Recreation and Visual Resources," on pages 3.5-10 through 3.5-15 does not identify significant adverse impacts to recreation and visual resources, and notes that the prescriptions would be consistent with existing Visual Quality Objectives identified by the Scenic Management System. Additional design features have been added to Appendix A (PCT-1 and PCT-2) of the Final EA in response to this comment, but this change does not affect the analysis evaluated in the Draft EA.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Recreation (I8A1-19)	The proposed action does not mention or consider project impacts on the important contribution of recreation to eastside communities.	Comment considered but no changes needed	Impacts to recreation were evaluated in the Chapter 3, Section 3.5, "Recreation and Visual Resources," of the EA (pgs. 3.5-10—3.15-13)
Recreation (I8A1-20)	To protect scenic and recreation values prescribe a minimum, 100-foot hand thin-only buffer on each side of all trails and main and intermediate roads in the project area.	Comment considered but no changes needed	The action alternatives meet the Forest Plan Visual Quality Objectives, Recreation Opportunity Spectrum, and Vegetation Treatment Prescriptions, as described in Chapter 3, Section 3.5, "Recreation and Visual Resources."
Pacific Crest Trail I6-4, I6-7, I6-8, I6-9, I15-7, I6-3)	Request for maps to show PCT; impact on PCT; allowed activities near PCT.	Comment considered but no changes needed	The action alternatives meet the Forest Plan Visual Quality Objectives, Recreation Opportunity Spectrum, and Vegetation Treatment Prescriptions, as described in Chapter 3, Section 3.5, "Recreation and Visual Resources."
Other Topics			
Utilities (I35-13)	Requests elimination of smart utility meters due to fire hazard	Comment considered but no changes needed	The suggestion is not within the scope of the project, The US Forest Service does not have authority to regulate utility systems. Regulation of utility infrastructure is provided by the California Public Utility Commission.
Biomass Facilities (I31-20, I31-21)	Concerns regarding the impact of using biomass energy facilities to manage biomass generated by the project.	Comment considered but no changes needed	These comments are outside the scope of the project. The final disposition of biomass material removed from the project is up to the purchaser of that material. If the material goes to a biomass energy facility, that facility will have undergone the state permitting processes, which includes environmental review pursuant to CEQA.
Sensitive Geological Areas (I8A1-21)	Open areas and areas with volcanic bedrock and mudflows in the eastside should be off limits to mechanical thinning and should be treated as minimal management areas.	Comment considered but no changes needed	This is not designated as a minimal management area; therefore, the minimal management area prescription would not be applicable. Regardless, in accordance with the 1988 PNF LRMP Minimal Management Prescription mechanical harvest is allowed, "Allow harvest of timber, fuel-wood, and other products only if: long term growth can be maintained, erosion and instability problems will not be induced or aggravated, unique scenic, geologic, ecologic, and significant cultural resource values are protected, no encumbrances are placed on lands scheduled for exchange." The marking shown in the picture constitutes an opening, which is part of variable density thinning in the proposed actions.
Introductory statements (I1-1, A1-1; I20-1; I34-2; I3-30; I4-1; I5-2; I6-1; I37-5; I37-12; I2-2; I37-2; I31-1; I31-6)	Introductory statements including statements regarding land management they support	Comment considered but no changes needed	Thank you for your comments on the Protect Project. Your comments have been received and considered by the Responsible Official. Specific issues identified in the comment letter are considered separately.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Concluding statements (A2-1; I14-8; I1-36; I3-30; I5-6; I17-10, I31-22; I37-4)	Concluding statements	Comment considered but no changes needed	Thank you for your comments on the Protect Project. Your comments have been received and considered by the Responsible Official. Specific issues identified in the comment letter are considered separately.
Project Area Knowledge (I21-1; I23-1; I29-1; I32-2)	Commenter explains experience with project area	Comment considered but no changes needed	We appreciate receiving comments from locals and those familiar with the area. Specific issues identified in the comment letter are considered separately.
Public Interest (I15-8)	Commenter plans to save plan and monitor progress of project	Comment considered but no changes needed	The Forest Service thanks you for your interest in the project.
Editorial changes (I20-3)	Request to remove internal project team comments	Other - See Remarks	In response to this comment, the Biological Assessments has been edited.
Forest Service Management (I15-10, I34-9, I35-10)	Concerns over the management of the Forest Service	Comment considered but no changes needed	The comment expresses concern about a non-project-related topic and does not raise issues related to adequacy, accuracy, or completeness of the EA.
Non-project-related topic (I35-3)	Issue with consultant’s past analysis of project at Monterey County High School	Comment considered but no changes needed	The comment expresses concern over the analysis of a different project and does not raise specific issues related to the adequacy, accuracy, or completeness of the EA.
Non-project-related topic (I35-11)	Comment discusses an example of a public agency action what worsened ecological conditions	Comment considered but no changes needed	The comment expresses concern about a non-project-related topic and does not raise issues related to adequacy, accuracy, or completeness of the EA.
Non-project-related topic (I17-8)	Fiscal Support for Defensible Space	Comment considered but no changes needed	Allocation of Federal funding to implement defensible space treatments on private land is beyond the scope of this project. However, over the past 10+ years the Plumas National Forest has provided funding to the Plumas County Fire Safe Council and Butte Fire Safe Council to complete defensible space treatments on private lands in communities within and adjacent to the Plumas National Forest through the Non-Fed Lands Wildfire Hazard Mitigation Program (formerly known as the Stevens Funds Program).
Non-project-related topic (I14-6, I17-7)	Home Insurance Issues in California.	Comment considered but no changes needed	Commentor relates that home insurance companies are declining to insure homes in the area and in California due to the high risk of wildfire. Suggests that providing funding for homeowners to complete defensible space will allow them to get insurance again. While beyond the scope of this project, low-cost and no-cost defensible space assistance is available to residents of Plumas and Butte Counties through Fire Safe Council led programs that receive a portion of their funding from Federal grants.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Non-project-related topic (I8A2-5)	Releasing the Mapes EA in winter did not allow the public to ground-truth any information in the EA due to heavy snowpack. Comment period should have been extended until the ground was snow free.	Comment considered but no changes needed	While this refers to another project, comment periods cannot be extended under 36 CFR 218 regulations. This sometimes leads to project timelines that warrant releasing project materials anytime throughout the year.
Purpose and Need			
Project objectives (I35-9)	Plan is public subsidy for timber; questionable goals	Comment considered but no changes needed	The Project alternatives evaluated in the EA meet the Purposed and Need for the Project, which is articulated in Chapter 1 of the EA (pgs. 1-3 and 1-4)
Support for Purpose and Need (I6-2, I40-3)	Support for purpose and need	Comment considered but no changes needed	Thank you for the support for the purpose and need of the Community Protection – Central and West Slope project.
No Alternative Addresses Purpose and Need (I8-31)	None of the action alternatives address the purpose and need to reduce extreme fire behavior and ladder fuels.	Comment considered but no changes needed	The commentor disagrees that any of the action alternatives address the Purpose and Need to reduce extreme fire behavior. In fact, all three action alternatives address this part of the purpose and need to different degrees. Tables 3.1-5 through 3.1-19 in the EA compare the expected outcomes of treatments under each action alternative with regards to reducing flame length and changing fire type. Overall comparison across the project area shows that resultant flame length would meet desired conditions in 80 percent of the project area under Alternatives 1 & 2, and on 27 percent of the project area under Alt 3. Fire Type would meet desired conditions on 92 percent of the project area under Alts 1 & 2, and 55 percent of the project area under Alt 3. (EA, Section 3.1.5, Pages 3.1-7 thru 20).
Socioeconomics and Environmental Justice			
Funding (I8.21)	There is currently enough money available (due to recent acts of Congress) to immediately go forward with a largely or completely manual treatment alternative.	Comment considered but no changes needed	The Socioeconomic analysis of the project does not indicate that funding is a limiting factor for implementation of Alternative 3, which relies most heavily on manual and prescribed fire treatments. Rather it found that Alternative 3 is the least costly alternative due to the inclusion of fewer mechanical treatment acres.
Request for Revenue Reporting (I39-22)	Requesting Forest provide expected revenue of timber sales for the project	Comment considered but no changes needed	Revenue from timber sales would depend on many factors and is expected to partially offset the costs of treatment activities. The exact areas to be treated through timber sales vs non-commercial thinning have not yet been delineated, so revenue estimates are not yet available
Tourism economy (I30-4)	Nature supports our economy, and this project will decimate the economy	Comment considered but no changes needed	The comment implies that the project would impact tourism and the economy but provides no evidence or rationale to support the assertion. See EA sections 3.5, Recreation and Visual Resources, and 3.8, Socioeconomics, which address these topics.

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Effects on low-income and minority populations (A1-7)	Identify low-income and minority populations at a finer scale using census block groups. Include additional outreach to affected communities consistent with EO 1496.	Analysis supplemented, improved, or modified	Section 3.8., Socioeconomics was updated to include requested information, including an analysis of minority and low-income communities at the census block level. This additional information does not change the findings or conclusions of the EA.
Special Land Designations			
Bucks Lake (I3-21)	Update and approve the 2015 Bucks Lake Wilderness Fire Plan	Comment considered but no changes needed	Comment is outside of the scope of the project
Pacific Crest Trail (I6-6)	Proper Analysis and mention of Congressionally designated areas like the PCT	Analysis supplemented, improved, or modified	Updates were made to the EA to illustrate and highlight the Pacific Crest Trail (PCT) in the “Special Land Designations” section of the EA. Additionally, Design Features PCT-1 and PCT-2 have been added to Appendix A of the EA.
Wild and Scenic Rivers (I3-23, I3-24, I3-25, I3-26, I1-21, I1-22)	Comments suggest treatments for designated and eligible wild, scenic, and recreational river designated areas, and raise concern that impacts are not evaluated.	Comment considered but no changes needed	The action alternatives meet the Forest Plan Visual Quality Objectives, Recreation Opportunity Spectrum, and Vegetation Treatment Prescriptions, and are consistent with the characteristics of congressionally designated Wild and Scenic Rivers, as described in Chapter 3, Sections 3.5, “Recreation and Visual Resources,” and 3.7, “Special Land Designations.”
Special Interest Areas (I1-22)	Inventoried Roadless Areas and Prescribed Fire	Additional alternatives developed and evaluated	Within the 464-acre area where the West Yuba IRA and the project area overlap, 100 percent of those acres are in WUI zones (87 percent WUI defense and 13 percent WUI threat). Mechanical thinning is required in this area to achieve the Project purpose and need of reduction in risk of catastrophic wildfire to communities, in particular in the WUI. Therefore, including this element in the Project in this location would not meet the purpose and need. A remote road system connects the Plumas and Tahoe National Forests through the North Fork Yuba River watershed in this location; therefore, mechanical treatments would also be necessary to reduce fuel loads to protect critical infrastructure. This location is also a part of other strategic ridges that are used for firefighting. Therefore, this alternative has been considered but has been eliminated from further study.
Special Interest Areas (I1-23, I1-24)	Disagreeing with Project Impacts on Wilderness, Inventoried Roadless Areas, and Special Interest Areas and support for Alternative 3 activities in these SLDs.	Comment considered but no changes needed	The action alternatives meet the Forest Plan Visual Quality Objectives, Recreation Opportunity Spectrum, and Vegetation Treatment Prescriptions, as described in Chapter 3, Section 3.5, “Recreation and Visual Resources.”

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Issue/Concern (Comment Numbers)	Comment(s) Summary	Response	Remarks and/or Project Record References
Tribal Knowledge/Relations			
Traditional Ecological Knowledge (TEK) (I3-9, I3-11, I3-29, I15-4, I13-3)	Tribal Co-management and TEK, including underburning, suggested as good practice, and appropriate use of herbicides.	Comment considered but no changes needed	Tribal consultation was initiated for the project in May 2022, and included the Mooretown Rancheria and Greenville Rancheria. While a "tribal co-management" proposal was not identified during the consultation or scoping processes we continue to work closely with willing tribal partners to implement projects on the Plumas National Forest. While a proposal to conduct cultural burning was not identified during the consultation or scoping process, we continue to work closely with willing tribal partners to implement prescribed fire projects on the Plumas National Forest. The Plumas National Forest has long had a prescribed fire program and is part of the Plumas and Butte Prescribed Fire Training Exchange (TRES) events which both include Tribal partners. Tribal scoping was completed on the project in May 2022. While a proposal to conduct cultural burning was not identified, we continue to work closely with willing tribal partners to implement prescribed fire on the Plumas National Forest.

References

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