



Sierra Pacific Industries

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Monday, December 16, 2024

Jennifer Eberlien
Reviewing Officer/Regional Forester
USDA Forest Service
1323 Club Drive, Vallejo, CA 94592
Attn: Community Protection - Central and West Slope Project

Dear Jennifer Eberlien:

Sierra Pacific Industries (SPI) supports the Decision of selecting Alternative 4: Vegetation Treatments to Protect Communities and CSO Territories, as outlined in October 2024, United States Department of Agriculture, Forest Service, Environmental Assessment, Community Protection - Central and West Slope Project; Plumas National Forest; Plumas, Sierra, Yuba, and Butte Counties, California; Located in portions of the Beckwourth, Feather River, and Mt. Hough Ranger Districts.

SPI would like to submit the following letter during the 45-day Objection Period to formally document our intent to object to the Community Protection - Central and West Slope Project **if any changes are made** to the EA or the Decision Notice/Finding of No Significant Impact (DN/FONSI) during the resolution period.

Making any alteration to the EA during the Objection Period and leading into the signed Decision Notice would not meet the primary goals of reducing the risk of wildfire impacts on communities, modify fire behavior in the wildland-urban interface, maintaining emergency access and evacuation, and protecting natural resources and critical infrastructure from wildfire.

SPI would like to submit the following items as they relate to Comments submitted during the Public Scoping period (SPI scoping letter, June 8, 2022). These items demonstrate SPI's agreement with the selection of Alternative 4 and why if any changes made moving forward would lead to our objection:

EA: 2.1.3. Treatment Method

SPI Letter Scoping Topic: *Mechanical Thinning/Product removal. Long-term maintenance. Prescribed burning.*

No changes should be made to the approach of "layering" treatment methods, including product removal, as it leads to desired conditions. The use of un-even aged thinning technique, variable-density thinning (VDT), is the best silvicultural approach for improving stand density and restoring habitat; no changes should be made to the VDT objectives or the three main elements as outlined in section 2.1.3 Treatment Method of the EA. Gaps, clumps and matrix prescriptions should stay the same as stated in section 2.1.3 Treatment Method. SPI supports Alternative 4 because it includes recurring maintenance treatments and proposes amendments to the Forest Plan

to achieve desired conditions. If any changes are made to section 2.1.3 or 2.6 it would lead to SPI's objection.

EA: 2.1.3. Treatment Method; 2.6. Alternative 4: Vegetation Treatments to Protect Communities and CSO Territories; 3.2.5. Environmental Effects for Wildlife; Appendix C National Forest System Land Management Planning Rule.

SPI Scoping Letter Topic: PACs and Forest Plan

As stated in the EA section 2.6, Alternative 4 “balances retention of wildlife habitat with forest resiliency objectives and the fuel treatments.” The loss of hundreds of PACs and critical habitat have illustrated how the current Forest Plan provisions are not working and Alternative 4's objective to implement portions of the 2019 CSO Conservation Strategy to work towards more intensive treatments within PACs, including mechanical thinning is supported by SPI and literature (Zulla et al. 2023. Forest heterogeneity outweighs movement costs by enhancing hunting success and reproductive output in California spotted owls, *Landsc Ecol*, <http://doi.org/10.1007/s10980-023-01737-4>.)

SPI would like to see more progressive fuel treatments in the future within territories and PACs, but if less aggressive treatments than what is outlined in section 2.1.3, 2.6, 3.2.5, and Appendix C National Forest System Land Management Planning Rule, are pursued during the resolution period SPI will object.

EA: 3.2.8 Environmental Effects for Sensitive Plants; 3.4.5. Environmental Consequences

SPI Scoping Letter Topic: % slope operability

In measures to protect species associated with cliffs and steep roadcuts, Alternative 4 prohibits mechanical operations on slopes greater than 50%, but in section 3.4.5 “project design features would not restrict mechanical equipment traffic based on the steepness of slope or length of pitch. SPI supports the decision to operate on slopes greater than 45% with specialist input and any deviation from this decision would lead to objection from SPI.

EA: 2.1.3. Treatment Method

SPI Scoping Letter Topic: Treatment across diameter distribution

SPI is discouraged by the 29.9” diameter limit in this project because the current silvicultural practice of removing mostly understory trees does not promote the complex stand structure necessary to create habitat, promote fire protection, and increase forest sustainability and resilience. SPI would like to see the national forest system move back towards forested stands with diversity of size, age, structure, and canopy cover classes. SPI would like to **encourage** the Agency to adapt silvicultural treatments and timber marking outcomes that would support this objective in the future. However, Alternative 4 encompasses other progressive approaches to improve desired conditions with no significant impact. If any changes are made to the EA with regards to section 2.1.3, EA, or the DN/FONSI, SPI will object.

EA: 3.8. Socioeconomics.

SPI Scoping Letter Topic: Socioeconomics

SPI is encouraged that socioeconomics was included in the EA and wishes in the future more emphasis is put on the economic impact industry brings to Plumas County. Highlighting the number of residences directly employed in the Environmental non-profits, Private fire businesses, Milling, Logging, Trucking (logging and lumber), Forestry, and Arborist industry should be outlined in the EA; as well as the magnitude of the indirect employment that results.

The information in the EA on page 3.8-6 under *Other Economic Benefits* lists only mining and logging employing approximately 70 full time workers; SPI Quincy Division mill currently

employs over 280 employees directly and over 300 are employed indirectly. SPI feels other industries associated with this project should have been highlighted in the EA. Additionally, the timber yield tax puts revenue back into the county, providing socioeconomic benefits; these value should have been captured in the EA. SPI does not object to this section of the EA but would hope in the future all forestry associated industry, direct and indirect, is captured in the socioeconomic section of the EA.

The USDA Forest Service developed a well written EA using the best available science and resource management strategies to move the project area towards the desired condition; SPI would like to see the Community Protection - Central and West Slope Project move forward as proposed in the DN/FONSI and would not object if left as proposed.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ann Anderson', with a long horizontal line extending to the right.

Ann Anderson
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