



December 16, 2024

Reviewing Officer: Jennifer Eberlien, Regional Forester, USDA Forest Service  
1323 Club Drive  
Vallejo, CA 94592

Responsible Official: Rick Hopson, Acting Forest Supervisor, Plumas National Forest, USDA Forest Service  
159 Lawrence Street  
Quincy, CA 95971-6025

**RE: Community Protection Central and West Slope Project #62873**

Friends of Plumas Wilderness (FoPW) provided project-specific written comments to Project #62873 on July 19, 2023 and on May 20, 2024.

Thank you for the opportunity to provide additional input on the Community Protection Central and West Slope Project. We appreciate that the Project includes a Forest Plan Amendment to allow for the use of prescribed fire in the Bucks Lake Wilderness and that proposed fuels treatments in Special Interest Areas were eliminated from the Project. To be clear, we strongly support fuels reduction treatments in areas with special designations, if the treatments do not adversely impact the values these areas are recognized for. We at Friends of Plumas Wilderness look forward to working with Plumas National Forest staff on future projects aimed at restoring the natural role of fire in the Wilderness area we led the effort to protect. Likewise, we and our partners at California Native Plant Society look forward to working with the Forest Service to develop site-specific fuels reduction treatment plans for Special Interest Areas.

**Objection:**

**Objection: Do not mechanically treat designated or eligible Scenic River Zones.** Friends of Plumas Wilderness is concerned that improving access to allow for the mechanical treatment of designated and eligible Scenic River Zones could significantly increase motorized access to these primitive and undeveloped reaches of the river. Uncontrolled motorized access to remote areas along the river could increase the potential for human-caused wildfire. In comments submitted by Friends of Plumas Wilderness on July 19, 2023 we clearly state: **“FoPW does not support the use of mechanical treatments removing trees up to 30” dbh along designated or eligible Scenic River Zones”.**

**Pertinent Law and Direction:**

**The 1968 Wild & Scenic Rivers Act (1968)** defines Scenic River Areas as "...rivers or sections of rivers that are...still largely primitive and...undeveloped but accessible in places by roads."

**Plumas National Forest Land & Resource Management Plan (1988)**

Recreation General Direction within the Scenic Zone is to "provide for recreation in a near-natural setting...". Recreation Standards and Guidelines state: "To the extent possible, design and manage recreational developments (including access) to avoid areas of high fire hazard and to prevent ignition and spread of wildfire."

**The Middle Fork Feather River Plan** states the Scenic Management Direction Objective is "to provide opportunities for river oriented recreation activities in a near-natural setting... Utilization of other resources will be permitted only to the extent that scenic values can be protected or enhanced...".

FoPW does not view improving vehicular access to mechanically remove trees up to 30" dbh along Scenic River Zones as protecting or enhancing scenic values or providing "opportunities for river oriented recreation activities in a near-natural setting". We fear that improving roads for fuel reduction treatments will encourage uncontrolled motorized access to Scenic River Zones and degrade existing Wild & Scenic River values. Furthermore, providing unmanaged vehicular access to high fire hazard areas will increase the likelihood of human ignition and the spread of wildfire.

We acknowledge that both the 3.6 mile long Milsap Bar Scenic River Zone and the 6.1 mile long English Bar Scenic River Zone of the Middle Fork Feather River were significantly impacted by the 2020 North Complex Fire and reducing fuels along these river reaches could improve scenic and ecological values. We prefer manual treatments removing trees up to 10" dbh as it would not require the construction or improvement of existing routes. If mechanical treatments are essential to achieve fuels reduction targets, we recommend a 20" dbh maximum and enacting measures to ensure no additional motorized routes to the river are created and human-caused wildfire risk is minimized.

**Remedies:**

We suggest the Forest Service consider the following three remedies for action. Each is independent and exclusive of the others.

**1. In designated or eligible Scenic River Zones, use only manual treatments removing trees up to 10" dbh** and follow up with pile burning and prescribed fire in the 2,289 acres of eligible and 1,584 acres of designated Scenic River Zones.

**2. In designated or eligible Scenic River Zones, utilize mechanical treatments to remove trees up to 20" dbh** and follow up with pile burning and prescribed fire. **Provide administrative access only during treatment, prohibit public motor vehicle access to the river during treatment, obliterate roads and evidence of damage from vehicles resulting from treatment, permit no additional motorized access routes to the river and ensure motorized vehicle closures are enforced.** Where recreational access occurs should be determined during the revision of the Middle Fork Feather River Plan. User-created motorized routes should not be a byproduct of fuels reduction efforts.

**3. Eliminate proposed treatments in designated and eligible Scenic River Zones.** Determine appropriate fuels reduction treatments with the revision of the Middle Fork Feather River Plan. The Plumas National Forest has eliminated proposed fuels reduction treatments from the Project in the Bucks Lake Wilderness and Special Interest Areas. Similarly, proposed treatments in Scenic River Zones could be eliminated from the Plan and addressed when revising the Middle Fork Feather River Plan.

**Our preferred remedy is #1, to use only manual treatments removing trees up to 10" dbh** and follow up with pile burning and prescribed fire. If manual treatments cannot achieve desired reductions in fuel loading, we are open to using mechanical treatments to remove trees up to 20" dbh but are adamant that public motorized access be restricted and enforced. Our least desired remedy is to postpone the decision until the Middle Fork Wild & Scenic River Plan is revised.

We look forward to sharing our objection to the Community Protection Central and West Slope Project and suggested remedies with Forest Service staff. If there are any questions related to points raised in this letter please contact me.

Sincerely,

*/s/ Ron Logan*

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