



VIA email: www.fs.usda.gov/project/plumas/?project=62873

December 16, 2024

Jennifer Eberlien, Regional Forester
U.S. Forest Service
1323 Club Drive
Vallejo, CA 94592

RE: Community Protection- Central and West Slope Project Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Community Protection- Central and West Slope Project (CPCWS) Project. Forest Supervisor Richard Hopson is the responsible official. The CPCWS project occurs on multiple districts on the Plumas National Forest.

Objector

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, Oregon 97232
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, Nevada, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. The CPCWS project will, if properly implemented, benefit AFRC's members and help create resilient forest conditions as well as ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative

Jake Blaufuss

111 Forest View Dr,

Quincy, CA 95971

jblaufuss@amforest.org

(530)360-2809

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA which are hereby incorporated by reference.

AFRC supports the stated Purpose and Need of the Community Protection – Central and West Slope EA.

1. *Reduce risk of wildfire impacts on communities and critical infrastructure.*
2. *Reduce the potential for extreme fire behavior in the wildland-urban interface.*
3. *Maintain road systems for emergency access and evacuations.*
4. *Foster an all-lands approach to fire and fuels management.*

EA: 2.3. Alternative 1: Vegetation Treatments to Protect Communities and Achieve Landscape Resilience**EA: 2.3, pg. 2-9:**

Alternative 1 would reduce risk of wildfire to communities, evacuation corridors, critical infrastructure, and natural resources through a combination of all treatment methods described in Section 2.1.3. Vegetation treatments would include multiple entries that complement each other to achieve desired conditions. For example, mechanical or manual thin treatment would thin a stand, hand or grapple piling would address limbs and slash, pile-burning would remove the piles, and underburning would reduce surface fuels. This alternative also includes recurring maintenance treatments, such as prescribed fire several years after an initial treatment to maintain desired conditions.

The Forest Plan specifies basal area and canopy cover requirements in mechanical thinning treatments in mature forest units outside of WUI Defense Zones. It also limits fuel treatments within California spotted owl PACs and HRCAs. The basal area and canopy cover requirements limit the ability to meet forest resiliency objectives (Safford and Stevens 2017; North et al. 2022), fuel treatments limitations in California spotted owl PACs can result in conditions under which California spotted owl habitat is at a high risk for loss from fire and/or drought and insects (Forest Service 2019). This alternative proposes to amend the Forest Plan to allow treatments beyond those specified to be performed to respond to current threats and the effects of climate change to

achieve the purpose and need of this project.

In our Draft EA comments we stated: *AFRC supports Alternative 1 in the Community Protection – Central and West Slope EA*. Any changes to the Proposed Alternative may reduce the acreage treated and effectiveness of treatments as described in the EA. Alternative 1 proposes utilizing Forest Plan amendments to meet acreage targets as well as effective silvicultural objectives. We object to any changes to the Proposed Alternative.

In our Draft EA comments we stated: *We support thinning overstocked stands followed by underburning to improve forest health and reduce fuel loads. We support silvicultural prescriptions based on a single effective thinning entry every 20 years. Heavier thinning on a 20-year cutting cycle would meet forest health objectives for a longer timeframe, create conditions more conducive to the establishment and growth of shade intolerant species, and provide sufficient value (saw timber) to be economical. A single entry, as opposed to numerous entries, would also minimize impacts associated with logging disturbance. Thin stands to stocking levels that will be forest health effective for at least 20 years. Stand Density Index (SDI) is an excellent measure of stand stocking density and vigor and can be used to determine effective tree stocking densities over time to meet forest health objectives*

In AFRC's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. The scope, measured in acres treated to a Relative Stand Density Index (rSDI) that is resilient to wildfire, should be the metric that indicates how well the Forest Service is meeting its  stated objectives on any given project. Any reduction in acres will inhibit the attainment of the project objectives. Fewer acres treated with variable density thinning will result in fewer acres with improved diversity, density, and structure.

Ultimately, we believe that full implementation of the acres in the Draft Decision Notice is the only way to best meet the Purpose and Need and to maximize its attainment, particularly the portion of the Purpose and Need that addresses the need for age-class diversity and long-term wood products, and that any incorporation of elements of the other alternative would retard this attainment.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of the other action alternatives into the selected alternative. As the current decision is a draft decision, potential exists for both the reduction of the level of acres treated and the intensity of those treatments that would compromise the forest health and diversity objectives stated.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Jake Blaufuss, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph".

Travis Joseph
President