

BOARD OF SUPERVISORS

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December 16, 2024

Officer Jennifer Eberlien, Regional Forester
United States Department of Agriculture (USDA)
Forest Service
Pacific Southwest Region 5 Office
1323 Club Drive
Vallejo, CA 9459

Submitted online at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=62873>

**RE: PLUMAS NATIONAL FOREST
DRAFT DECISION NOTICE/FINDING OF NO SIGNIFICANT IMPACT
COMMUNITY PROTECTION - CENTRAL AND WEST SLOPE PROJECT #62873
PLUMAS COUNTY ADMINISTRATIVE REVIEW (OBJECTION) OPPORTUNITY**

Dear Officer Eberlien:

The Plumas County Board of Supervisors understands that Rick Hopson, Acting Forest Supervisor of the Plumas National Forest, released a draft Decision Notice/Finding of No Significant Impact (DN/FONSI) selecting Alternative 4 of the October 2024 Environmental Assessment (EA) for the “Community Protection – Central and West Slope Project” located on approximately 217,721 acres within portions of Plumas, Yuba, Butte, and Sierra counties on Plumas National Forest public lands to implement a combination of fuels reduction and other vegetation treatments that have the objective of reducing the risk of wildfire and climate change to communities in the wildland urban interface (WUI), emergency ingress and egress evacuation routes, critical infrastructure, and natural resources on sections of the Beckwourth, Feather River, and Mt. Hough Ranger districts concentrated within several communities that have moderate-, high-, or very high-risk wildfire hazard potential including Portola/Beckwourth, Mohawk Valley, Johnsville, Eureka Ridge Estates, Cromberg, Greenhorn, Spring Garden, Cutler, Massack, Quincy, Keddie, Meadow Valley, Bucks Lake, Faggs Ranch, South Fork, Little Grass Valley, Camel, Slate, and American House. The draft EA describes proposed Alternative 4 treatment methods to include manual and mechanical vegetation removal, prescribed fire, herbicide application, and reforestation.

The Board of Supervisors further understands that, at this time, objections must be submitted within 45 days following the publication of the legal notice, or no later than December 16, 2024, and that objections will only be accepted from those who have previously submitted specific written comments regarding the proposed Project during scoping or other designated opportunity for public comment.

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PLUMAS COUNTY STANDING SCOPING COMMENT LETTER

On June 21, 2022, the Board of Supervisors sent the Plumas National Forest a scoping comment letter concerning the Notice of Proposed Action for the Community Protection – Central and West Slope Project with ten (10) comments, generally described as follows:

1. Consider forest health to include tree mortality.
2. Consider protecting critical infrastructure as defined and listed in the critical facilities inventory in the Plumas County Local Hazard Mitigation Plan (October 2020).
3. Consider the multiple benefits of fire and fuels management to include recreational trails for the community and issues pertaining to the development of permanent fire breaks should consider the management and eradication of noxious weeds and vegetation.
4. Consider disposal of organic material to support community economic resilience drivers such as forest products and wood utilization.
5. Consider including Greenville, Crescent Mills, Taylorsville, and the Indian Valley area as a defined Community Protection Zone.
6. Address seasonality and air quality when using prescribed fire.
7. Elaborate on the method to identify which Plumas National Forest Service and County roads are included in the Project.
8. Utilize Plumas County Office of Emergency Services (OES) and the Geographic Information Systems (GIS) Department to understand existing Plumas County evacuation routes, mapping, and signage and where gaps exist for improvements to the systems for road egress and ingress.
9. Conduct a consistency and compatibility analysis of the Forest Plan Amendment to the 2035 Plumas County General Plan Goals, Policies, and Implementation Measures.
10. Collaborate and consult with Plumas County as an interested party through the Plumas County Coordinating Council (PCCC).

ADMINISTRATIVE REVIEW (OBJECTION)

The Board of Supervisors' scoping comments with discussion of administrative review (objection), are as follows:

Critical Infrastructure (Comment #2), Recreation Trails (Comment #3), County Roads (Comment #7), and Emergency Egress/Ingress (Comment #8)

The draft EA does not go into any detail as to what critical infrastructure and which recreation trails and County and forest service road segments, including those for emergency ingress and egress evacuation routes, are included in the proposed Project (Alternative 4).

For example, statements on page 2-9 are made as to "...road maintenance and/or improvement may occur on any forest service road segment where it is needed to implement Alternative 4; however, it is not known at present which forest service roads would require maintenance or improvements to implement the Project until on the ground condition surveys are done in the pre-design phase. County and private roads may also require maintenance to support the Project."

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The direct, indirect, and cumulative effects of the proposed Project (Alternative 4) activities on critical infrastructure, recreation trails, forest service roads, County roads, private roads, and emergency ingress and egress evacuation routes are of great interest to the Board of Supervisors and specifically when needing to find necessary funding sources and solutions for County road maintenance implementation to support the Project.

It appears Plumas National Forest is taking a Condition-Based Management approach that supports flexibility between planning and implementation in natural resource management, allowing project locational specific information and surveys to be completed (especially for landscape-scale projects), at the time the Plumas National Forest is ready to implement the activities on any particular part of the Project area.

It is essential that Plumas County be aware and involved, as appropriate, in the pre-design phase, to understand more specifically the critical infrastructure, recreation trails, forest service roads, County roads, private roads, and emergency ingress and egress evacuation routes included in the Project.

Herbicides (Comment #3)

The draft EA on page 2-8 describes seven proposed herbicides, including aminopyralid, chlorsulfuron, clopyralid, fluazifop, glyphosate, imazapyr, and triclopyr registered by the California Department for Pesticide Regulation for use in California to control native and invasive plant infestations within the Project area. The draft EA goes on to state the specific herbicide selected for application at a site would depend on the size and location of the infestation and/or target plant species to be treated, that application methods for the selected herbicides would include only ground-level application on foot or use of all-terrain vehicles or other similar vehicles with a boom-mounted sprayer, and that no aerial spraying would occur. Overall, 51,000 acres or nearly one-quarter of the proposed Project (Alternative 4) area would have herbicide applications to combat invasive plant species, control competing vegetation for reforestation in burned areas, provide for maintenance of permanent fire lines, and to control shrubs in early seral stands.

It is recognized by the County that herbicide use may be needed; however, Plumas County strongly recommends the Plumas National Forest first utilize all other means and methods (e.g., grazing of goats, sheep, and cattle) available to combat and eradicate noxious and invasive plant species in the proposed Project (Alternative 4) area and that chemical herbicides use only be applied as a last resort method. The targeted ground-based approach of any herbicides is required to be applied consistent with manufacturers' specifications and best management practices (BMPs) must be followed to protect water resources, humans, and non-target organisms, including pollinators. Buffers to watercourses and other sensitive environments, knowing proper wind speeds and temperature, and pollinizer protection, for example, are sound BMPs. Additionally, water quality testing and monitoring is strongly advised.

Communities of Greenville, Crescent Mills, Taylorsville, and the Indian Valley area (Comment #5)

The draft EA did not take into consideration the County's scoping comment to include the areas of Greenville, Crescent Mills, Taylorsville, and Indian Valley in the Project area for the purpose of retaining and making permanent the fire control lines, at a minimum, that were established around these communities to defend against the 2021 devastating Dixie Fire.

It is acknowledged by the County that these areas are included in the Plumas National Forest North Fork Forest Recovery Project area.

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Plumas County Coordinating Council (Comment #10)

The PCCC was established by the Plumas County Board of Supervisors on October 21, 2008 with the adoption of Resolution 08-7514 to coordinate the plans, policies, and priorities of Plumas County with those of federal and state agencies, particularly the United States Forest Service. The PCCC functions as an advisory body to the Board of Supervisors. Resolution 08-7514 states, “A resolution adopting and implementing Coordinated Agency Status in accordance with federal and state laws, and notifying Federal and State agencies maintaining jurisdiction over lands and/or resources located within the County of Plumas of the intent and expectation that Federal and State agency actions shall be made consistent with all county land use plans, and other management plans affecting the natural environment, economic stability, or the public health and safety of the citizens of Plumas County, and to otherwise notify and confer with the County.”

Engagement with Plumas County local government and its residents and stakeholders is critical to effective Project outcomes; therefore, when/if a Decision Notice is issued, scheduling agenda items before the PCCC is a necessity to implementing the Project (Alternative 4) with the County as a central stakeholder.

IN CLOSING

The Board of Supervisors is highly aware that the Plumas National Forest has experienced multiple recent years of catastrophic wildfires and agrees there is a need to take action and protect Plumas County communities in the WUI, emergency ingress and egress evacuation routes, critical infrastructure, and natural resources from future wildfires, and supports the Plumas National Forest in making “Community Protection – Central and West Slope Project” a scope of work priority.

Plumas County appreciates the opportunity to provide an Administrative Review (Objection) discussion to continue to stay engaged through a collaborative planning and environmental analysis process.

The “Community Protection – Central and West Slope Project” is an important effort, which executed properly, will have a positive impact on Plumas National Forest public lands, associated watersheds, and wildlife health and lead to greater community safety and infrastructure resilience.

Sincerely,



Greg Hagwood, Chair
Plumas County Board of Supervisors
530-283-6170
520 Main Street, Room 309
Quincy, CA 95971

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Cc: Kevin Kiley, Congressional District 1
Megan Dahle, Senate District 1
Heather Hadwick, Assembly District 1
Rick Hopson, Plumas National Forest, Acting Forest Supervisor
Ryan Bauer, Plumas National Forest, Fuels and Prescribed Fire Program Manager
Board of Supervisors, Plumas
Allen Hiskey, Clerk of the Board of Supervisors
Debra Lucero, County Administrative Officer
Sheriff Todd Johns
Josh Brechtel, Interim County Counsel
Tracey Ferguson, Director of Planning
Rob Thorman, Director of Public Works
Willo Vieira, Agricultural Commissioner/Sealer of Weights and Measures