



CALIFORNIA
NATIVE PLANT SOCIETY

April 28, 2025

Attn: Travis Sanchez, Post-Fire Recovery Manager
Plumas National Forest
875 Mitchell Ave., Oroville, CA 95965

RE: Tributaries Forest Recovery Project #63289

For over a half century the mission of Friends of Plumas Wilderness (FoPW) has been to study, explore and safeguard the integrity of natural ecosystems where the Sierra and Cascades meet. We work to celebrate and protect local public lands with unique cultural and ecological values.

The California Native Plant Society (CNPS), a non-profit environmental organization with over 13,000 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices. We greatly appreciate the incorporation of California Rare Plant Rank List 1 and 2 species into the impact analysis for this project.

Our comments focus on proposed treatments within lands with special designations. We strongly believe that using forest restoration and fuels treatments appropriate for special land use designations will provide a diversity of approaches to forest management and increase the likelihood of successfully meeting management objectives while protecting the values these unique areas are recognized for.

Special Area Designations:

Mud Lake Research Natural Area: Given the global significance of the Baker cypress stands within the two units of the Mud Lake RNA, and the high risk of these populations being extirpated through increased fire return intervals or encroachment from competing vegetation types, we at FoPW and CNPS urge the Plumas National Forest to prioritize actions to expedite the recovery and resilience of forest ecosystem values within the RNA. Treatments planned in and adjacent to the RNA should facilitate high severity fire at frequencies required to ensure the perpetuation of Baker cypress, which is listed as Vulnerable on the International Union for the Conservation of Nature (IUCN) Red List. An IUCN designation of Vulnerable means the species is considered to have a high risk of extinction in the wild, in this case driven by a small number of fragmented populations, decreasing area of occupancy, habitat degradation, and a declining numbers of mature individuals. Baker cypress trees take approximately 18 years to reach maturity and we would recommend a minimum fire return interval of 30 years to ensure that a sufficient quantity of seed is set to ensure recruitment. High severity fire should occur prior to individuals dying of old age or being outcompeted by other species encroaching on Baker cypress habitat.

Grizzly Peak Inventoried Roadless Area: Maps in the Draft EA of the proposed 15-mile Shaded Fuelbreak along Grizzly Ridge do not adequately specify what techniques are proposed to be used in the IRA. We request that the Final EA provide more detailed descriptions and maps of proposed treatments within the Grizzly Peak IRA. We support the use of prescribed fire and managed fire to reduce fuels in Wilderness and Inventoried Roadless Areas. In the Grizzly Peak IRA, we support hand-thinning and pile burning where necessary to improve fire suppression control lines and safely allow for the use of prescribed and managed

fire. We do not support using Commercial thin techniques or chipping within the IRA. Given the open character of the ridge on the southwest edge of the Grizzly Peak IRA and a history of motorized trespass onto the ridge, we have questions and concerns about the proposal to create approximately two miles of Shaded Fuelbreak within the IRA.

Citizen Inventoried Roadless Areas: The Draft EA states 6,712 acres of proposed silvicultural treatments within the Project Area overlap with CIRAs. We appreciate that no new roads will be built or re-established with the implementation of the Proposed Action and Project design features will minimize impacts to the character of the CIRAs. We strongly recommend that user-created routes not shown on the Plumas National Forest Motor Vehicle Use Map within CIRAs be closed.

Wild and Scenic Rivers: We appreciate that Plumas National Forest leadership acknowledges all planned Forest Service management activities within ¼ mile of both sides of an Eligible Wild and Scenic River will be consistent with management direction for Wild and Scenic Rivers until a suitability determination is made.

We are strongly opposed to the proposal to Commercially Thin 168 acres within the Eligible Wild and Scenic River corridor along Mo Bisipi Creek. We do not believe the sale of timber within ¼ mile of the Eligible Wild and Scenic River conforms with General Direction and Standards and Guidelines for Wild and Scenic Rivers outlined in the Plumas National Forest Land & Resource Management Plan under Timber: "To protect recreational, scenic, and fish and wildlife values.." and "Harvest timber only to maintain or enhance use safety and scenic quality, protect special habitat, or prevent insect or disease epidemic." We believe hand-thinning trees up to 10" DBH, pile burning, and using frequent prescribed fire is more appropriate along Wild and Scenic River sections and can meet management objectives of improving visitor use safety, scenic quality, and special habitat. Forests within narrow Wild and Scenic River corridors should be managed to improve recreation opportunities, such as dispersed camping, not for timber production.

We are also opposed to mechanically treating 239 acres along Eligible Wild and Scenic Rivers with Reforestation - High Intensity Site Preparation. Again, we believe hand-thinning trees up to 10" DBH, pile burning, and using frequent prescribed fire is more appropriate along Wild and Scenic River sections and can meet management objectives of improving visitor use safety, scenic quality, special habitat and recreational values.

We support the rehabilitation of 3.4 miles of fire suppression line and repair of three stream crossings within the Eligible Wild and Scenic River section.

Brady's Camp Proposed Special Interest Area: The map of Special Area Designations on p. 137 of the Draft EA includes Brady's Camp Proposed Special Interest Area but Section 4.2.13 Special Area Designations on p. 136 does not include the SIA. It appears a Shaded Fuelbreak is proposed on the eastern boundary of the Brady's Camp Proposed SIA but no silvicultural treatments are proposed within the SIA. If treatments are proposed within Brady's Camp Proposed SIA it would be helpful to know what those treatments are.

We appreciate the opportunity to provide recommendations on ways to improve the Tributaries Forest Recovery Project. In short, we advocate for using forest restoration and fuels treatments appropriate for special designations as they will provide a diversity of approaches to forest management and increase the likelihood of successfully meeting management objectives while protecting the values these unique areas are recognized for.

Sincerely,

/s/ Ron Logan

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