Data Submitted (UTC 11): 4/22/2025 6:56:38 PM
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Comments: April 21, 2025

Kurt Sable
Plumas National Forest
Via: https://cara.fs2c.usda.gov/Public//CommentInput?Project=63289

Re:Comments on the Tributaries Forest Recovery Project Draft Environmental Assessment/Initial Study

Dear Mr. Sable:

Thank you for soliciting public comments in response to the Tributaries Forest Recovery Project Draft Environmental Assessment/Initial Study (DEA). CalWild is primarily concerned about the potential project impact on segments of Last Chance and Mo Bisipi Creeks determined eligible for National Wild and Scenic River protection.

The DEA states on page 139 that the proposed treatments would not have an adverse effect on the eligible reaches of Last Chance Creek or Mo Bisipi Creek, their free-flowing condition or outstandingly remarkable values. The information provided in the DEA is insufficient to support this statement.

Last Chance and Mo Bisipi Creeks were listed as eligible segments in a public notice from the Plumas National Forest dated 6/8/94 that proposed an amendment to the Plumas National Forest Plan to identify potential Wild and Scenic Rivers. This forest-wide assessment was conducted in response to an appeal settlement of the 1988 Plumas National Forest Plan. The public notice was deficient in providing essential information about these eligible segments that is needed in the context of the proposed project.

Forest Service guidelines require the protection of an eligible Wild and Scenic River's free-flowing condition, outstandingly remarkable values, and highest potential Wild, Scenic, or Recreational classification. The 6/8/94 public notice that documents the eligibility of these two creeks includes basic list but no description of outstandingly remarkable values and a poor-quality map showing the tentative Wild classification of Last Chance Creek and Recreational classification of Mo Bisipi Creek.

Last Chance Creek is listed as eligible with outstandingly remarkable hydrology, ecology, and other values and Mo Bisipi Creek (formerly known as Squaw Queen Creek) is listed as eligible with outstandingly remarkable cultural/history and vegetation value. No additional information is provided concerning these values, which makes it difficult for the public to assess potential impacts in the context of the proposed project. For example, are these values site specific or generally applicable to the entire corridor?

One of Mo Bisipi's outstanding values is vegetation, which implies either the presence or one or more rare plants or an assemblage of rare plants. The Botany Specialist Report lists several rare plants in Tables 4-2 and 4-3, and Figure 6-2 is a map that indicates a number of these plants may be located in the Mo Bisipi corridor. But the report fails to mention whether any these plants represent the creek's outstandingly remarkable vegetation value. The only vegetation value noted in the Specialist Reports is white bark pine, which is a higher elevation plan not generally isn't found in river corridors. This is why the DEA should provide a detailed description of each outstandingly remarkable value and discuss how the project will avoid adversely impacting those values.

Most of the proposed project activities are located outside of the eligible river corridor. But Figure 2. Project Area

and Proposed Primary Silvicultural Treatments map shows a relatively small area of the eligible stream corridors in the vicinity of the Last Chance and Mo Bisipi Creeks confluence slated for commercial thinning and high intensity site prep reforestation. As it does for other "Focus Areas," the DEA should provide a more detailed map of this area to show that logging or roadbuilding will not occur within Last Chance Creek's Wild corridor. Although logging and road building could be allowed in Mo Bisipi Creek's Recreational corridor, these activities would not be allowed if they harm this creek's outstanding outstandingly remarkable cultural/history and vegetation value. This is why a more detailed description of outstandingly remarkable values is appropriate to effectively analyze potential impacts.

CalWild respectfully requests that the final EA for the Tributaries Forest Recovery Project include detailed information concerning the outstandingly remarkable values of the eligible segments of Last Chance and Mo Bisipi Creeks and a more detailed "focus" map of the project activities proposed in the eligible river corridors in the vicinity of the creeks' confluence.

Sincerely,

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