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First name: Michael
Last name: Friend
Organization:
Title:
Comments: I oppose the proposed forest plan amendment to increase the diameter limit of harvested trees. The forest has not demonstrated a site-specific need to harvest trees over 30-inches diameter-at-breast-height (DBH). Instead the forest attempts to give itself the discretion to harvest whichever tree it chooses, up to 40-inches DBH, across this very large project area that encompasses 180,000 acres. The proposed action is not site-specific.

There is already a dearth of large mature conifers across the Plumas NF (PNF) and in the Tributaries Project Area. The recent large fires of the past 5 years burned approximately 650,000 acres and have killed a great many of the largest conifers in the PNF. Insect infestations have killed a great many more and fire suppression efforts removed another large amount. Removing more of the largest conifers is unnecessary and the forest has not demonstrated the need. The stated restriction of removing only one tree over 30"DBH for every 10 acres is not adequate because the forest can easily draw outer perimeter boundaries of arbitrary size, then calculate the average to stay within that limit while still removing any, or even all depending on how many there are, over-30-DBH tree it chooses. See the example below. Add to that the intent to allow logging contractors to choose which trees to remove. That is a blatant and egregious conflict of interest.

Example: Hypothetically speaking, there could be 100 over-30-DBH trees clustered in 10 acres. The stated limit seems to allow that only 1 of these could be harvested. But the forest can simply draw the outer boundary of 1,000 acres and that 1,000 acres needn't legally contain any more over-30-DBH trees. The forest could legally remove all 100 of the over-30-DBH trees (i.e. 1 per 10 acres). And once the NEPA decision is signed they would not be required to notify the public. Notifying their own scientists is not adequate protection because those scientists would still have no power or authority over the decision. Indeed, even in the extremely unlikely occurrence that every scientist, forest service employee, and member of the public all agreed that the forest should not remove a certain tree or group of trees, none of those would have any power to prevent the harvest of those trees. Even if they were all notified (very unlikely) or somehow became aware, the only recourse would be to litigate and that requires time and money that is often not available. The forest leaders are well aware of this and have created this proposed action  (and several others) to deliberately reduce the possibility that the scientists, forest service employees, and the PUBLIC can influence the project(s). Hence, the project, as written would shift a great deal of power from the public and scientists and give that power to one unnamed future line officer. Such discretion lowers trust and decreases the odds that the project will be implemented the way it was planned by agency scientists and explained to the public.

SNFPA is place for a reason and it is arbitrary and capricious for the agency to amend that plan. They have not even shown the need. The forest effectively asks the public to trust that they'll do the right thing. We have SNFPA precisely so that we can rely on it rather than trusting one unnamed future line officer. Trusting one unknown person would be negligent and irresponsible. Instead we can keep SNFPA as is, giving us more trust that the project will comply with objective science while effectively treating the forest with mechanical thinning, hand thinning, pile burning, and underburning which would greatly reduce risk of uncontrolled wildfire.

The forest effectively asks the public to trust that they will only remove trees over 30" DBH when necessary. However, the proposed action, as written would give that decision to one unnamed future line officer. One person should not be given that power. Forest line officers do attempt to meet timber targets and acre given credit for doing so. That gives them incentive to take as many large trees as they can. They are not incentivised to reduce risk of wildfire.

The Sierra National Forest Plan Amendment (SNFPA) has a goal to increase the frequency of large trees across

the forest. The proposed treatments will promote new conifer seedlings that will increase risk of high-severity wildfire. I am strongly in favor of forest thinning. But I opposed the removal of the largest, most fire-resilient conifers. Their removal will effectively trade large fire-resilient trees for a much greater number of small conifer seedlings and brush that will very likely grow in their place. That effect can be observed in many landings and forest openings created by forest management in the past.

I oppose the aspen treatments. A very large number of Aspen colonies across the 650,000 recently burned acres have effectively been treated by the recent wildfires. A great many conifers surrounding and shading those colonies have been killed by fire. Aspen colonies have responded with prolific re-sprouting. Those conditions exist across the 650,000 acres on PNF and across millions of acres of recently burned forest throughout northern California. Thus, the biodiversity that depends on Aspen colonies for habitat is in no way at risk on the PNF. The purpose and need related to aspens is not valid. The proposed action would allow the forest to find any aspen colony in the project area that does have mature conifers nearby and harvest every one of those conifers (with no size limit at all) within 150 feet of the outermost existing aspen stem. The forest should not be allowed that discretion. As explained above, one unknown line officer would have that power and could not be prevented from unnecessarily removing large trees. It is unreasonable to sacrifice any of our largest mature conifers to promote Aspens when there is already a dearth of large conifers and an abundance or recently treated thriving aspen colonies.

Please rely on objective science, do site-specific planning, and do not rely on trust. If it were wise to rely on trust we'd have much less need for law, regulation, and policy.