



BUTTE COUNTY FOREST ADVISORY COMMITTEE

July 27, 2020—5:00 P.M. Meeting via ZOOM

Minutes

1.00 Call to order – Butte County Public Works Facility, Via ZOOM

2.00 Pledge of allegiance to the Flag of the United States of America

2.01 **Roll Call** – **Members:** Nick Repanich, Thad Walker, Teri Faulkner, Trish Puterbaugh, Dan Taverner, Peggy Moak

Alternates: Vance Severin, Carolyn Denero, Frank Stewart

Guests and Public: Russell Nickerson, (District Ranger, Almanor Ranger District, Lassen National Forest); Brett Sanders (Congressman LaMalfa's office); Clay Davis (NEPA Planner, FRRD); Dennis Schmidt, Director of Public Works; David Phelps, Pair-O-Dice 4 wheelers, Jim Houtman, BC Fire Safe Council, Paula Daneluk, Director of Development Services

2.02 Self-introduction of Forest Advisory Committee Members, Alternates, Guests, and Public – 5 Min.

3.00 **Consent Agenda**

3.01 Review and approve minutes of 5-26-20: M- Puterbaugh, 2nd Faulkner, Approved 4-0

Review and approve minutes of 6-22-20: M-Faulkner, 2nd Repanich, Approved 3, 1 Abstention, 1 technical difficulties

4.00 **Agenda**

4.01 Forest Projects Review – Current Quarter: Discussion & required FAC action for USFS projects affecting Butte County residents' forest management, recreational, environmental, socio-economic interests(Chair)

4.02 Lassen NF Almanor Ranger District- Russell Nickerson (District Ranger): Report and Q & A on prescribed fire plans, pending, proposed and modified projects, SOPA and Non-SOPA:

- Hog Fire Update: Mopping up after heavy rain, possible salvage sale pending
- Almanor area had a few small fires after the lightning storms, 17 acres in Humbug Valley
- Hat Creek District, Eagle Lake being hit harder
- Constantine Fire near Doyle in Plumas County had mandatory evacuations imposed.
- MVUM Update: 25N05 is being proposed as ML3 Mixed Use – being reviewed at the Regional Office now
- OSV Final Decision is pending at the Regional Office, some tables being modified and enhanced to be in sync with other Forests
- The South Lassen Watershed Improvement project CE is being signed soon, pending tribal consultation
- Robbers Creek project off A21 between Hwy 44 and Westwood is moving forward
- The Fredonyer Butte Trail Project is moving ahead in collaboration with the Sierra Buttes Trails group
- The F&W Grant application for meadow restoration projects from Colby Meadows up into Yellow Creek was successful, and NEPA is now in the works
- OHV patrol is being effective, tickets being issued for safety issues and resource damage. Public is encouraged to send pictures of resource damage and note concerns about increased usage in the area.

Plumas NF Feather River Ranger District, Clay Davis (District Planner): Report and Q & A on pending, proposed and modified projects, SOPA and Non-SOPA and Collaborator's Meeting Update:

- PNF French Creek CE Project was discussed. Collaborator group of 8+ to meet on Tuesday. Trish Puterbaugh had submitted some additional comments, (attached). Some discussion of roads that may be subject to closure to improve owl PAC conditions. The decision on this project is estimated to be about 1 year out. Clay to circulate a map showing project area post meeting.
- Clay noted that the Collaborators group also solved some issues with the Granite Basin project

4.03 New Business—Considerations for upcoming meetings: Next meeting is July 27, 2020 - ZOOM, 5:00 PM

- Access to evacuation routes, traffic studies, in the event of wildfire (CalFire, PW, BCFSC, Nick R.) To include all rural foothill areas
- South Feather Water & Sewer District - Recreation and Water Projects
- Fish & Wildlife

4.04 Public Comment (THE COMMITTEE IS PROHIBITED BY STATE LAW FROM TAKING ACTION ON ANY ITEM PRESENTED IF IT IS NOT LISTED ON THE AGENDA.)

The meeting was adjourned at 6:30 PM

July 8, 2020

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To: Jason Vermillion; Clay Davis; Katherine Carpenter PNF Supervisor
Re: Comments on French Creek II Project
Feather River Ranger District
Plumas National Forest

I wrote a brief scoping letter regarding this project 6/22/20 and I will also attach it here. I will reiterate concerns I had from that letter again.

There are no Townships, Ranges or sections listed on the project proposal to know where this project area is, except the vague description in the presentation, "10 miles north of Berry Creek CA at elevations ranging between 2,300 and 4,500 feet.". This is something the public needs to know to be able to comment on or analyze this project.

There are no maps we can reference. Please include maps.

After I wrote the above comment Clay Davis sent a map and an invitation to a field trip to review the project. He included a map with roads and stand delineations. He included a description of the planned prescriptions. With this information I was able to drive the project area and see the land for myself, as I will not be able to attend the field trip July 14th.

The PNF website lists French Creek I as a Hazardous Fuels Project and the Proposed Action says it is a Section 605 of the Healthy Forests Restoration act (HFRA) 2003 Categorical Exclusion (CE).

The PNF website lists French Creek II as a "Insect and Disease Resilience Project" and the Proposed Action says it is a Section 605 of HFRA Hazardous Fuels Project. Which are they? Insect and Disease CEs or Hazardous Fuels CEs?

Again, it is important for the public to know what kind of CE you are planning in order to analyze this project.

The overriding concern about this project is there has been no Cumulative Impact Assessment of the acres you have already logged and acres proposed in the French Creek area. The French Creek watershed was already heavily impacted by the Camp Fire 1 ½ years ago. You have already done salvage logging after the Camp Fire in the Big Bar Hazardous fuels project. This logging is ongoing. I will not site the overwhelming number of studies and research that show salvage logging after wildfire is detrimental to the entire ecology of the forest, especially the watershed

and wildlife. Hundreds of acres of this French Creek watershed were and continue to be salvage logged on private lands. You have added a plan for using herbicides in the region and are in the process of “hazard tree” removal on 4 Trees Road. 3,000 acres is planned in the French Creek I project and now another 3,000 acres planned for French Creek II. These all using Categorical Exclusions without a cumulative effects analysis. Considering these multiple effects – which cannot even be analyzed as they are either ongoing (Big Bar, Camp Fire effects, 4 Trees) or have not even started, (3,000 acre French Creek I) and hundreds of acres of clear cut salvage on private lands it seems a cumulative effects analysis is overdue and a Environmental Assessment is urgently called for.

This is also extremely unusual as you are logging in one of the most heavily impacted watersheds in the USA, the Feather River, and you plan to log in California Spotted Owl (CSO) Protected Activity Centers (PAC's), open roads and take down huge “hazard trees” that are within PACS.

There is no upper Diameter Limits (UDL) on the hazardous trees to be logged under French Creek II and there is a dbh of 30” throughout the project. Considering all the big trees that have already been burned and salvaged logged, it seems a lower dbh is appropriate, especially in this habitat for our declining California Spotted Owl. (CSO)

According to the 2004 ROD, Page 45, Management Objectives for PACs are, “to avoid vegetation and fuels management activities within PACs to the greatest extent feasible”. On page 49 of the ROD it states, “ Avoid PACs to the greatest extent possible when locating area treatments.” Why are you planning to do work in the PAC's when this is the direction you are supposed to follow?

If treatment is absolutely necessary the ROD on page 51 states, “remove only material needed to meet project fuels objectives”.

This PAC in the French Creek II Project does not appear to have had much impact from the Camp Fire. As with most of the French Creek II ground, the fire could be described as low intensity and a “good fire”. There is very little mortality, except in the areas that were salvage logged already. However, the PAC and HRCA are heavily impacted by the subsequent and ongoing salvage logging and logging activities throughout the French Creek I & II footprint. The intersection of 6 roads is practically in the middle of the PAC and HRCA.

The PAC has beautiful large trees in some areas, it is quite steep in some areas and the roads leading into the PAC where you plan to cut “hazard trees” were often difficult to find. I cannot understand how you can justify going into the PAC on roads that are mostly impassable to take out “hazard trees”, that may endanger the public.

For instance road 23N30X, leading into the PAC on the North side of the project is closed. There are large piles of gravel in front of 23N30X and 23N30XA. Neither road is passable. In fact 23N30X is a single track path I walked for ½ mile. The only reason to reopen this road leading to unit 43 & 47 would be to make money on large “hazard trees”. The public is certainly not endangered by these trees on a

single track path that is mostly likely used rarely by motorcycles. I will attach a photo of 23N30X.

These “hazard trees” are valuable habitat for the CSO and other wildlife. We know logging is detrimental to wildlife and watershed and the 2004 ROD is clear that PAC’s are to be avoided. Close the road. Leave the trees.

Another case where it appears you are going overboard looking for hazard trees to log – meaning big, valuable trees, is on Road 23N31 leading into the North side of the PAC in unit 18. Again, this road is sometimes impassable. There are valuable willow along the road in one section. The burn here is evident, but it is obviously a “good burn”. There has been a beautiful understory response and there are grasses, ferns and flowers growing. This area was probably thinned fairly recently?

People are not “endangered” by snags at the end of this dead end road that is miles from a well-traveled byway. The CSO need these snags and does not need the disturbance of road building and logging in this PAC. Close this road before it enters the PAC, leave the “hazard trees”. Follow the ROD.

Road 23N86 is another road that is impassable with a car. It goes between the PAC and the HRCA in units 42 and 20. The land is steep. How can it be economical to rebuild this road, unless you plan to take big trees from the HRCA? It seems this road building and rebuilding should be analyzed in an EA, especially as it will impact CSO, Northern Goshawk and the watershed.

According to your 3 page project proposal you will do service work in the PAC “Designed to maintain habitat structure and function.” What does this mean? How is a member of the public supposed to understand this vague language regarding this extremely valuable habitat? We know you have to keep 60-70% canopy cover in the PAC. We need more information.. Management Objectives are clearly outlined in the ROD page 45, “Avoid vegetation and fuels management activities within PACs to the greatest extent feasible.” Why are you logging here? “Where PACs cannot be avoided (we know you can avoid the PAC) in the strategic placement of treatments, ensure effective treatment of surface, ladder and crown fuels within treated areas. If nesting or foraging habitat in PACs is mechanically treated, mitigate by adding acreage to the PAC equivalent to the treated acreage wherever possible. Add adjacent acres of comparable quality wherever possible.” I don’t see any justification for going into the PAC, it can be avoided.

If it was clear you were doing this work to “benefit the CSO”, or “improve habitat” we could possibly trust your plan. However, it seems clear the objective is to get out the cut.

I understand you are doing your 2nd year of surveys in the French Creek area for wildlife. Can we please see the results of the surveys? This is information the public needs to assess the project effects.

Besides no cumulative effects analysis on these acres, cutting in the HCRA down to 50% cc will render all of these acres no good for nesting. Where will the CSO fledglings go to start their own territories? How will this HRCA be affected by potentially 7-8,000 acres of logging in the region? How will the PAC and HRCA be affected by all these new roads? Is it legal to reopen roads that were obviously closed in PACS?

The entire project is difficult to trust due to the large acres of “roadside hazard”. Plumas National Forest has some of the biggest trees in the Sierra Nevada. These trees are rare on our forests. We know we have less than 5% of our old growth forests remaining in the Sierra Nevada. Trees that are “dead, dying, unstable, or likely to die in the near future” and are within striking distance of people, facilities, or roads captures many, many beautiful, old legacy trees. Especially when these trees are on roads that are closed or impassable. The public is not in danger. Going up to the top of the project on dead end Roads 23N11X, 23N11XA and 23N201X are 4 large stands of “Roadside Hazard” units 2,3,4,5. Please tell me what shape these roads are in as I was unable to go up there? Are they also impassable? Is the public's safety in danger because of these trees so far off the beaten track? I would like to see photos of these roads at this time.

These roads are a deadend on the PNF map, but they do lead to what looks like several private land parcels and what looks to be roadless areas above the Feather River. Why are these trees hazardous?

If you close these roads going nowhere the trees can be saved. They are valuable habitat and may not die, or fail. If the roads are closed, the trees will not have the potential to cause property damage (the road?) personal injury or fatality. Simply close the roads and save the trees. Do what is right for the forest and the public.

The purpose and need on page 3 of the proposal constitutes 2 paragraphs. We agree, the forested areas of the French Creek project area are in an overstocked condition. You state “some experienced an elevated level of tree mortality caused by bark beetles during the recent drought from 2014 to 2016. In addition to being overly dense, these areas have a history of tree mortality during drought resulting in heavy fuel loads and higher risk of stand replacing wildfire. Thinning and rx fire are highly recommended throughout the project area to reduce tree density and surface and ladder fuels levels.” The design would be to maximize the retention of large trees, to the extent that the trees promote stands that are resilient to insects and disease, and reduce the risk or extent of, or increase the resilience to wildfires”. We also agree thinning and rx fire are highly recommended and valuable for these acres. However, are you using the hazardous fuels CE or the Insect and Disease Resilience CE?

We know the Camp Fire burned at low severity in the French Creek II area, and Danny Clucks report from September 2019 agrees. He also says that “Tree mortality caused by forest insect and disease pest agents is occurring at a very low levels across the project area. This follows the current pattern for the entire NE California region where a return to normal to above normal precipitation since 2017 has greatly improved tree health and vigor.” His report outlines the numbers of dead trees on page 6. These numbers are all in the low or moderate range for drought conditions. His report contradicts your statements above about the current state of the forest.

We take issue with the plan to create openings or select “trees growing in suppressed crown positions” in the old growth Sugar Pine stand described on page 11 of Clucks report. Why? According to Clucks report, “sugar pine should be

retained as much as possible during any thinning operation in order to preserve genetic diversity, especially white pine blister rust resistant individuals. This is a beautiful grove with “relatively healthy” large diameter sugar pine where some are infected with (endemic since 1910) white pine blister rust and there is some top-kill. There are low levels of cambian kill from the fire. This grove should be left alone to evolve how it is supposed to evolve! Logging any trees in this grove (huge trees) will potentially damage and scar other trees. Leave it alone! The only reason I can see to go in there would be for money. Leave it alone to evolve as nature intended. Why go in there and make a mess!?

It is very clear, driving the project area the forest would benefit from thinning and prescribed fire. We would sincerely ask you do the work that needs to be done on the general forest, do some mild thinning in the HRCAs, thin the plantations and leave the PACs and old growth groves alone. We cannot trust what is best for the forest and wildlife will be done in the PACs or the old groves. We cannot trust that the forest and watershed will be benefitted by cutting huge, old hazard trees at the end of dead end roads to “protect the public”. Rebuilding and reopening roads is expensive and detrimental in every way – you know this. Thin and take care of the forest that is easy to access and will not impact the wildlife, habitat and watershed. There are thousands of acres out there to work on. Why go out of your way to create disturbance and when there is so many other acres to take care of? Why? We can do things differently and more efficiently.

Thank you for taking my comments

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