



John Preschutti
 PLUMAS FOREST PROJECT 
P.O.Box 11
Blairsden, CA 96103
jwpreschutti@gmail.com
(530) 310-5139

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Dear Regional Forester,
Jennifer Eberlein:

This is a letter of objection to the Decision Notice (DN) and Finding of No Significant impact (FONSI) for the Plumas National Forest Community Protection-Central and West Slope Project (CPP) — responsible official, Acting Forest Supervisor, Richard Hopson.

Earlier this year I submitted an Objection to this project. After the objection period the Decision Notice was withdrawn and the project was remanded to the Forest Supervisor for further review. The DN and modified Environmental Assessment that resulted does not adequately address the issues I brought forth in my original objection, I therefore resubmit that Objection, by reference, to be considered part and parcel of this Objection. This includes the documents I requested be brought forward by reference in that Objection.

The Decision Notice (DN) and Finding of No Significant Impact (FONSI) are in error because they rely on key information presented in the DN and Environmental Assessment (EA) that is patently false or misleading. Over the past decade, on this project and many

others, I have presented the Forest Service with documented evidence, including photos and surveys and comments, that support this assertion.

In brief, the Forest Service contends that logging/mechanical thinning is beneficial with regard to forest health and fuel reduction/fire concerns, while I have shown that in all cases the opposite is true.

The photographs and commentary below represent another attempt to get the Forest Service to acknowledge this issue and properly analyze it.

The photos show a unit of the Jackson Project, that starts on Highway 70 at the upper Mohawk Vista turnoff between Blairsden and Portola. The unit runs uphill north of the highway and fronts directly on the homes of the Mohawk Vista Subdivision to the west. The project was implemented about twenty years ago. The figures each have a brief description but will be referenced in more detail in the narrative below.

Figure 1. Shows a wildlife island in the middle of the unit left completely untouched, including no handthin or fire. Nevertheless, in the time since project implementation, undesirable thicket fuels species were naturally addressed leaving dominant pine and a few cedar with a large height to live crown, as well as no regeneration.

Figure1.



Figure 2. Shows logged portion of unit with extensive regrowth of manzanita and cedar, with a complete species conversion from pine to cedar.

Figure2.



On page 7 of the DN under “How Alternative 4 Addressed the Purpose and Need”, it makes several characterizations of current conditions, almost all of which are false or can be questioned as to degree and relevance to the decision.

First, to quote, “...forest stands would continue to be at extreme risk of tree mortality...”. The Forest Service states that “analysis firmly supports” this. However, the primary category of forests in the

project area, mid-elevation, Sierran mixed conifer, is about 120 years old, and has easily survived several major droughts. This includes the most recent, greatest drought in recorded history, and still these forests exhibit no sign of mortality in dominant and codominant trees that could be considered extreme. In fact, Forest Service Project EAs have continually pointed out the dearth of snags, and provided for snag recruitment — that has even included purposely killing trees by girdling.

Furthermore, there is a severe lack of significant down material, that, among other things, provides moisture and cooling to an otherwise hot and dry, flammable forest environment. Routinely removing trees the size of refrigerators, and spacing the remaining trees for alleged survival, will not improve matters in this regard.

See Figure 1., where, in the absence of any treatment, no mortality in the dominant trees has occurred.

Second, “...unnaturally high levels of understory vegetation and ladder fuels would remain...”.

What this statement doesn't say is that every day for decades, in stands that have not been logged or entered for about fifty years, levels of understory vegetation and ladder fuels have been “naturally” taking themselves out of the equation. It's only in areas of recent logging that these conditions are unnaturally happening. That's clear to anyone viewing these types of conditions, but, as noted above, over the past decade and more, I have also provided the Forest Service evidence of it in the form of photos and surveys.

See Figure 1. Where the live, undesirable “...understory and ladder fuels...” species condition present at project implementation has entirely disappeared and does not “remain”.

Third, “...tree densities would continue to be high...”

As I’ve pointed out, excessive tree density, is naturally and rapidly reversing itself, favoring fire-resilient species, particularly in the suppressed and intermediate ladder-fuel category. The remaining dominant trees are widely scattered in desirable, ecologically and fire-resilient clumps, and show no signs of eminent mortality. See figure 1.

Fourth, “...the extensive ingrowth of smaller trees would continue...”

Again, the only place where extensive ingrowth of smaller trees is taking place is in the Forest Service’s mechanically-thinned stands of the past three and a half decades. Everywhere else, conditions such as these are naturally reversing themselves.

See Figure 1. and 3..

Additionally, here, and everywhere else in the Project documentation, no credit is given to the beneficial aspects of “current conditions”, as described above, and substantiated in my ongoing comments.

To ignore and counter what is right before our eyes, the Forest Service points to the science behind “analysis firmly supports”. To address this quandary I include the following from the John Muir Project Objection:

“The Forest Service refuses to meaningfully address the findings of Baker et al. (2023), which comprehensively documented a pervasive pattern of scientific misrepresentations and omissions by Forest Service studies regarding historical forest density and fire severity, finding that these Forest Service studies created a “falsification of the scientific record”. Baker et al. (2023) is uncontested in the scientific literature, but the Forest Service’s response is nothing more than a defensive and vitriolic personal attack that refuses to substantively and honestly address the findings of Baker et al. (2023).”

In my case, the response is more intentionally dismissive than vitriolic, but the effect remains the same.

More on this issue is exemplified on page 72 of the EA where it states:

“Species composition would be expected to continue to shift toward shade-tolerant species, including fir and cedar species.”

As clearly shown above and below, on lands not recently logged there is no shift toward shade-tolerant species. In reality, on all occasions the reverse is true. The Forest Service is highly negligent in omitting this crucial part of the fuels and forest structure equation from the EA, thereby not making it available to decision makers for the “hard look” they are required to make under NEPA.

One of the main stated goals of these projects, that continues into the CPP, is to combat the shift towards shade-tolerant species such as fir and cedar. In my comments here, and on many other projects, I’ve shown that that conversion, originally caused by logging half a

century or more ago, began reversing itself about thirty years ago, and is now almost completely non-existent, or near the very end of its cycle. (Except where more recent mechanical logging thinnings have taken place, and the pattern is renewed. See Figure 2.)

The Jackson Project was implemented about twenty years ago. Figures 1. shows a wildlife island within the unit that went untreated in any fashion. A few things stand out:

First, about thirty years ago, when the project was being planned, this most likely looked like a stand of dominant and codominant pine and cedar trees choked by smaller, perceived undesirable, live cedar. Nevertheless, it was left without any disturbance for wildlife sheltering, etc. But, after a couple decades, time and nature relieved all of the perceived negative conditions associated with undesirable smaller trees and left all of the largely pine dominants in place.

Second, even at the time when the smaller trees were alive there were no other trees coming up from below them, and despite their extreme die-off nothing released in the soil or canopy has changed that attribute.

Both of the above points completely belies the idea that a continual worsening conversion is taking place. The reality is it's the opposite.

Third, despite the original crowding, and subsequent extreme drought, no dominant trees succumbed to either of those things.

Finally, all of this desirable maintenance: suppressing undergrowth, raising the height-to-live-crown, providing humus to the Forest floor, leaving nicely spaced, desirable dominants, and generally

improving forest health, and fuel conditions for the environment and the nearby human community, has been done completely free of charge to the Forest Service and taxpayer (other than the cost of designating a keep-out line around the area).

Figure 2. Is a representative example of most of the rest of the unit. It shows a couple things.

First, where no new regeneration existed before implementation, the project activity has caused the reintroduction of small conifers and manzanita.

Second, the conifer species present is completely cedar and represents the conversion the Forest Service claims to be trying to avert. There is virtually zero pine regeneration in a forest with a largely pine overstory.

In summary, where the Forest Service did nothing (wildlife island), the Jackson Project achieved its general goals, and where it implemented prescriptions close to those proposed by the CPP it achieved the exact opposite. Despite bringing detailed proof that supports these serious allegations to the attention of the Forest Service on countless occasions, they have routinely been completely ignored.

Variable Density Thinning

The Forest Service indicates that Variable Density Thinning (VDT) will somehow address issues associated with their perceived overall homogeneous condition of the forest. However, because of the extreme CPP prescriptions regarding basal area and canopy closure

(as evidenced by the need for a Forest Plan Amendment), there is really no room to significantly implement VDT. In larger-tree stands, if you leave the best dominant trees in a couple VDT clumps on an acre it would require clearcutting the rest of the acre to meet targets.

This is exacerbated by the fact that many of the mechanical thinning areas designated in the CPP have already been mechanically thinned starting in the early nineties. The vast majority of these prescriptions were single-tree -spaced to generally 20-feet. You can easily see this on the ground and find it in the marking guidelines. Obviously, you can't drag trees closer together, so the mitigation of VDT to homogeneousness over these thousands of acres is largely non-existent.

Additionally, Figure 3., below, is a photo of the Mapes Project, that was marked around 2020, and has subsequently been folded into the CPP. It, likewise, has a VDT prescription, and was ostensibly less extreme than the CCP because it required no Forest Plan Amendments regarding basal area and canopy harvesting limits. However, in this depiction of a very typical mark throughout the project area, five out of the seven large, mature, fire-resilient, shade providing, regeneration suppressing, carbon storing, dominant trees are being taken from this very definition of a clump, leaving the last two evenly spaced — thereby completely destroying the benefits of variable density.

Figure 3.



I have continually requested public meetings on this and other sites — or general detailed conversation, regardless of the format — to discuss all the serious issues I have brought to these projects. If I had been allotted even one of the many meetings I requested on the Mapes Project and CPP, the Forest Service could have shown me where VDT applied (along with addressing other issues). As it stands, the mark was single-spaced and clearcuts, without a single example of VDT — except for the few trees over 30 inches that happened to be near each other.

Homogeneity Versus Heterogeneity

To help illustrate this issue, the following Figures, 4.-7., are of the Haskell Project area.

(As a side issue, it is currently being winter logged under sketchy, wet soil conditions brought on by extreme saturation during the recent large atmospheric river rain event that occurred before the ground was frozen in November. In the meantime the ground has only partially frozen and is also very wet in general being near a meadow with a lodgepole pine component. You can see both if you expand the photo. The photos were taken yesterday. Last night's storm added more snow which has eventually turned to rain on the site. There are decks of fresh cut 20-24" trees with limbs everywhere under the snow, and at least three pieces of heavy equipment in the unit. Severe soil damage and compaction will result from any further action.)

Page 72 of the EA quoted above continues in the following sentence:

“The landscape would continue to be dominated by mid-seral closed-canopy forests, resulting in a homogeneous landscape with an increased susceptibility to large-scale drought, insects and diseases, and fires with high tree mortality.”

The Forest Service has picked out a single element of forest-wide homogeneity to stand in for all of it — “closed-canopy” — and even that it has wrong.

Figures 4.-6. below show the extreme homogeneity caused by a very typical Forest Service fuel-reduction, forest-health project (and, this is achieved with no relaxation of Forest Plan Standards and Guidelines). Despite common assurances of VDT induced heterogeneity, trees are all of identical size, spaced widely apart,

creating no horizontal diversity, and the crowns are all at the same height creating no vertical diversity. On the tens of thousands of acres where mechanical thinning is prescribed, it will largely look just like this and worse under requested more extreme CPP guidelines.

And, in Figure 5. my hat gives you an idea of the large size of fire resilient pines routinely taken from these stands.

Figure 7. was taken within tens-of-feet of the other photos facing onto the other side of Highway 89, where the Mabie Project of twenty-five years ago prescribed a handthin. This is largely typical of the general, mixed conifer forest in the project area, of which I'm very familiar. If you expand the photo and look around you'll see that there is clumping of varied species of dominant trees beyond the main clump to the left, and even way up into the top far right. Contrary to the homogeneous "closed-canopy" conditions characterized in the EA, these clumps are surrounded by naturally occurring openings in the canopy.

Figure 4.



Figure 5.



Figure 6.



Figure 7.



Conclusion

The Forest Service has somehow come up with the idea that the answer to more than a century of intensive over-logging, that has put us in a dire situation in all ecological respects, is to do even more logging of large, dominant trees than has ever been considered before.

I'll leave the answer to that to the following quotes from the Forest Service's Sierra Nevada Ecosystem Project Report:

“...the short- to medium-term need most apparent in many Sierran forests is not the establishment of new regeneration but rather the removal, or thinning, of excessive numbers of small understory trees. This is a high priority, both to reduce the hazard of severe wildfire and to begin to restore forests to a healthier, more sustainable condition.”

And,

“Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other recent human activity.”

Thank you for this opportunity to comment,

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John Preschutti