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Title:

Comments: Dear Forest Service,

The attached comment material contains significant scientific and other information on the very serious ecological concerns associated with the massive deforestation and burning schemes the HTNF is proposing for vast areas of the already naturally fragmented and also human-fragmented forest lands. This same landscape is nearly all often greatly disturbed by livestock grazing/livestock facilities/roading/etc. lands.

This terrible proposal being ramrodded through in the midst of the pandemic and would rely on under a mere CX to destroy vast areas and landscapes including IRAs and Wild areas, a host of sensitive species habitats thus harming populations already spiraling towards extinction - and for which the FS has not conducted necessary integrated pre-decisional baseline inventories. It will harm and destroy irreplaceable cultural sites. It will make lands much more susceptible to climate change stress coupled with grazing stress. HTNF project adverse impacts will last for centuries - or potentially Forever, given the extremely poor record of recovery of arid lands following fire when cheatgrass invades in the wake of continued grazing - as shown by studies of BLM fire rehab. See Arkle et al. paper showing lack of sage-grouse and other wildlife habitat - and just look at the vast weedlands where both BLM and FS fire rehabs have failed.

An EIS must be prepared to address all the watershed, endangered species, sensitive species including Pygmy Rabbit and Pinyon Jay, migratory bird, MIS species including Sage-grouse, water quality and quantity, impacts on fragile springs, seeps, meadows and linked biota, increase of irreversible invasive species and linked toxic polluting herbicide use, fuels issues - which are far more complex than the FS claims that "reducing" fuels will magically solve fires - and in fact this scheme is highly likely to make fires much worse.

The FS must provide an analysis of the amount of current climate change stress on these lands/waters/biota, and take a careful hard look at the degree to which these projects will make adverse climate change impacts worse (hotter, drier, weedier, windier), and many other issues including the immense battery of BLM wildlife habitat destruction and watershed devegetation proposed in landscape all around all of the HTNF lands at issue here.

We stress that BLM has just issued a FEIS for its massive "Restoration" EIS - see WLD and other group comments below.

The combined effects of the HTNF's proposed scorched earth CX and the BLM's welter of ongoing and foreseeable destruction must be fully assessed in an EIS - as must the effects of the extremely high stocking levels and lack of grazing of capable lands that occurs across the HTNF - with many Ranger Districts lacking any modern-day NEPA analysis of grazing's effects. There has been no concrete look whatsoever at all the existing deforestation, crested wheat and other exotic seedings, livestock facilities and other habitat disturbance/loss/fragmentation that has already occurred. Further, the forest plan is very old and is not based on current science in making allocations.

Moreover, the the FS massive burins CX scheme, and the grazing program forest-wide is not complying with the existing protective requirements of the plan for soils, water, watersheds native biota, cultural values, forest values, and many other elements of the Humboldt and Toiyabe plans.

We note that the HTNF never bothered to reply to WLD's fall request for a site visit to examine the deplorable cattle grazing conditions on the Santa Rosa RD. Yet in this scorched earth new CX proposal, the FS could radula

burn up huge areas of the SRRD without ever addressing the severe degradation of Sage-Grouse and migratory bird habitat, the the loss of wet meadows, and ever-advancing cattle-caused cheatgrass and other problems plaguing this landscape. The HTNF's current massive forest-wasting proposal will only exacerbate ALL of these existing problems. Its outcome will be made worse by climate change stresses, and it will aggravate the Climate Crisis by polluting the atmosphere with CO2 currently stored in native woody vegetation.

We also wish to request a meeting to discuss our concerns with the Forest officials pushing this awful destructive scheme.

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