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Organization: Carson Forest Watch

Title:

Comments: Objection- Carson National Forest

Final Land Management Plan FEIS and Draft Record of Decision

Oct. 7, 2021

Objection Reviewing Officer

SW Region- US Forest Service

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The following are reasons for an objection to the Carson Forest Plan FEIS and Draft R.O.D. (James Duran Forest Supervisor)

- 1) We have been involved from the beginning of the Forest Plan Revision process and wrote comments on the scoping and draft and also attended public meetings at the Camino Real District Office on the Forest Plan Revision.
- 2) Note we were also involved in the current Plan in the 1980's.
- 3) While we appreciate some of the emphasis on local community involvement and acknowledge need of uses of the forest and forest products - we remain concerned with some aspects of the FEIS and draft R.O.D. and would request improvement with a few important parts of the Plan.
- 4) Specifically - we are concerned that only 6 out of the 13 areas that met criteria of Wilderness designation were proposed in the FEIS. The Rationale for not including all area with wilderness qualities and characteristics was not sufficient. Especially with climate change and development loss of habitat loss of wildlife corridors and numerous threats to biodiversity on a changing plants. Protection of all area with wilderness quality is critical.
- 5) We recommend the Carson take another look at the areas that were not inculked as wilderness - appreciate and recognize the importance of intact forest for watershed protection wildlife habitat and biodiversity, and add those areas that were deleted.
- 6) We also were disappointed to see the "wetland jewels" not be designated. (as recommended by Amigos Bravos) - while the Plan does mention measures to protect such areas - this leaves much to funding and budgets and is not as protective as designating wetland jewels.
- 7) The increase in timber production and harvest levels is significant and fails to disclose where and what trees would be included in the annual board foot amounts. We are concerned regarding the larger foot amounts. We are concerned regarding the larger diameter trees - esp. over 12"-16" DBH that would constitute part of this annual timber harvest. Thinning of smaller diameter trees is prudent in areas of the Forest - esp. in Ponderosa Pine. However, The Plan fails to disclose specifics and leaves these details to future NEPA projects. This hides the cumulative impacts of the new, larger annual rate of harvest. It also does not show where the areas for

harvest are located so that the public can determine how past timber harvest will compare with future harvesting to impact watersheds, wildlife, and forest bio-diversity.

8) The old growth section needs further details - maps showing how old growth has changed from 30 years ago, etc. Climate change and warming and changing snowpack and soil moisture and rainfall patterns are all effecting the trees on the Carson and the FEIS fails to document how the significant increase in trees harvested will affect tree mortality from climate change and drought.

9) We believe the proposed harvest amounts are not a sustainable amount when climate change and long-term mega-drought impacts are factored in-

10) We do support community stewardship (and CFRP) projects that thin smaller trees adjacent to communities and have written numerous letters of support for local groups doing such projects over the past 10-15 years on the Carson.

Sincerely, Joanie Berde for Carson Forest Watch