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Jennifer Eberlein, Regional Forester

U.S. Forest Service, Region 5

Submitted online at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=62873>

Dear Regional Forester Ms. Eberlein,

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

Feather River Action! is a Plumas County, CA based grassroots group building community and advocating for the health of the local watershed. You can find us online at FeatherRiverAction.org.

These comments are additional to the joint objection submitted by Chad Hanson of John Muir Project. We are also including our 63 page comments on the original FONSI/ EA, submitted with no error message received (and subsequently lost by the USFS) in July 2024, as the "emergency" project proceeded without consideration of our comments.

Largely, as described in the joint objection comments, the new plan differs insubstantially from the original. Even the absence of industrial logging from Spotted Owl PAC's does not consist of a significant change as these increasingly threatened owls require *intact* Home Range Core Areas (HRCA's) for their survival - these remain slated for industrial deforestation in the (revised) plan.

We, along with the Plumas Forest Project and John Muir Project, strongly object to this project. We allege that the USFS plan would harm public health and safety, damage the environment, and undermine your stated goals of protecting communities and public land.

We strongly suspect that many of the people who consider themselves "pro-logging" in our community have little idea of the scale of what is planned, an unprecedented industrial exploitation of Plumas County. If this plan comes to pass, many would be shocked to see how this (often pristine) landscape that we love could be damaged by billions of dollars in industrial equipment and toxic herbicides.

The scale of this project, particularly when considered in the context of several similar projects in the area, demands that USFS prepare a full Environmental Impact Statement, not a cursory EA.

The science shows clearly that "thinning" actually dries out forests and allows sun and wind to penetrate into the canopy, allowing wildfires to progress more rapidly, REDUCING evacuation times during wildfire. Thinned forests allow for wind speeds 15-20 times higher than unthinned forests (citation provided in objection comments). It is gross negligence that the US Forest Service neglects to adequately consider the impacts of their operations on forest moisture and wind, critical factors in wildfire outcomes.

The sum total of large industrial logging projects in Plumas County is in the hundreds of square miles. These BILLIONS of our taxpayer dollars should rightfully be spent to actually protect communities from wildfire, focusing

on the 200 feet around structures, and providing funds for structure hardening, what the science tells us is actually effective at preventing structure loss.

The USFS is using a series of disastrous climate driven wildfires in recent years as justification for interventions that will only reduce forest and community resilience.

Industrial logging in protected mature and old growth areas now threatens spotted owl and many other species and amends the forest plan to allow industrial logging of mature trees in the owl's home range core areas. According to experts, this is an extinction plan for the spotted owl in the Northern Sierra.

USFS authorized logging would not protect the forest, it would degrade it, and harm the environmental quality of Plumas County-- the main reason why people visit this area, which would in turn damage the local economy.

The EA contains no identification of critical moist areas of the forest which act as "fire refugia" where humans, other animals, plants and rare species can find refuge during wildfire events. Some of these areas, such as between Plumas County Road A-15 and the Gold Complex Fire, provide a buffer between potential wildfires on the flanks of Beckwourth Peak and the community of Iron Horse, home to at least 269 people. Without an in depth analysis the USFS risks disturbing existing (natural) fire refugia / fire buffers, drying them out and creating conditions that convey wildfires much faster, putting communities at significant risk of death/ injury.

An inadequate accounting of biologically rich and culturally significant locations (that are likely to be damaged from CPP activities) such as:

- ancient old growth juniper and pine groves on Beckwourth Peak, considered extremely sacred to Native American tribes

- Aspen grove/ wetlands and mature/ old growth forest groves southwest of Carman Valley Rd. Drainages in the Lakes Basin/ Graeagle area

- Mature and Old Growth forested areas in the Strawberry Valley area, including areas that have likely never been disturbed by timber harvest.

It was greatly alarming to us that during your recent call-in meeting about this plan, your District Silviculturist Kristin Winford, when asked by a member of the public about whether the ecological importance of the only significant temperate rainforest in the Sierra had been considered, she replied that this area is just considered "eastside pine." This is clearly not factual, and reveals a shocking misunderstanding/ misrepresentation of crucial ecological distinctions by USFS lead staff on this project.

The planned use of (an undisclosed quantity) of carcinogenic, frequently water soluble herbicides threatens soil, surface and groundwater putting both private wells and public water sources at risk of contamination. The USFS has not agreed to any water source monitoring program, and many of the toxins planned to be used cannot be easily or affordably tested for in wells by the public. Without specific quantities of herbicide being provided, how can the significance of the effects be properly considered?

We expect federal agencies to be transparent with how you are using taxpayer money. This is not happening. We have been asking for specifics and maps showing the logging that is taking place in the strawberry valley area in the so-called "emergency area." Though we have been asking for maps and details of these projects for many months, this information has still not been provided. Trees that are marked for cutting, prior to the public comment period shows the institutional disdain the USFS has for the public. The lack of public meetings, complexity of the comment procedure, use of emergency authorizations to bypass normal objection procedure, are all unacceptable.

Please consider these comments, our joint objection comments with Plumas Forest Project and John Muir Project, and our original 63 page comments. We expect the USFS to follow the scientific consensus, which clearly indicates a need to focus solely on the first 200 feet around communities and structures themselves if the goal is truly "community protection." But that appears to be simply a pretext for the intensive logging and poisoning of the wild that has been planned for some time.

Josh Hart
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