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Elizabeth Berger

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Pacific Southwest Region

USDA Forest Service

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Vallejo, CA 94592

Submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?project=3375>

Re: Objections to the Final Plans, Final Environmental Impact Statement (FEIS) and Draft Records of Decision for the Sequoia and Sierra National Forests

Dear Ms. Berger,

Pursuant to 36 CFR Part 219 Subpart B, I am objecting to portions of the Draft Records of Decision, Final Forest Plans, and Final Environmental Impact Statement for the Sequoia and Sierra National Forests. The responsible official for the Sequoia plan is Forest Supervisor Theresa Benson and for the Sierra plan is Forest Supervisor Dean Gould. This objection covers a variety of issues related to resources affected by the revised forest plan and offers recommendations on how objection issues could be resolved.

As an objector, pursuant to 36 C.F.R. [sect] 219.57(a), I request a meeting to discuss the issues raised in the objection and potential resolution of those issues.

Objections

1. The evaluation of carbon impacts in the FEIS and supporting documents is inadequate.

Climate change impacts on our forests and communities are no longer hypothetical future threats—they are happening now. Drought, rising temperatures and extreme weather are stressing forest ecosystems already impacted by logging, mining, roadbuilding, fire suppression, and other activities. Wind- and weather-driven wildfires are becoming more difficult to control and fire seasons are getting longer. Meanwhile communities are continuing to expand into the wildlands, putting more people and infrastructure at risk. The stakes are high: this acceleration of crises creates not only urgency to act, but unpredictability as to what will actually work—or potentially make matters worse. In this time of cascading crises there are, legitimately, great uncertainties and disagreements among experts. This means that land management agencies, leaders, and community members who seek actionable solutions in good faith can arrive at very different conclusions.

Under its Planning Rules USFS must use [“the best available scientific information to inform the planning process.”] Plans must consider [“system drivers, including . . . climate change”] and [“reasonably foreseeable risks to ecological . . . sustainability.”] USFS must address [“measurable changes on the plan area related to climate change”] in its plan monitoring program. Plans must also provide for [“ecosystem services,”] which include [“regulating services such as long term storage of carbon.”]

I believe that because USFS has excluded dissenting scientific perspectives in its selection of [“best available science”], the plans retain management actions that would not only increase carbon emissions in the short term but could impair forests’ ability to sequester and store carbon in the long term. Moreover,

\* The USFS’s analysis overstates carbon emissions from wildfires compared to logging, thinning, and other activities and thereby inflates the long-term carbon reduction benefits of actions to prevent fire. This distorts the comparison of alternatives and the extent to which the plans provide for the [“ecosystem service”] of [“long term storage of carbon.”]

\* The analysis dismisses the importance of existing forest carbon stocks, with no guarantee of longer-term carbon sequestration benefits, by not quantifying carbon stock losses and emissions from thinning activities.

\* The analysis relies on faulty assumptions about mechanical thinning reducing wildfire risk and severity. These treatments may in some circumstances increase burn severity and tree mortality.

\* The analysis did not calculate or account for greenhouse gas emissions, changes in carbon storage, or sequestering capacity related to timber harvesting for any of the alternatives. Logging affects both carbon storage and forest productivity (the rate at which trees and plants will grow), which substantially reduces the capacity of the forest ecosystems to absorb, sequester, and store CO<sub>2</sub> over time, thereby diminishing carbon carrying capacity.

USFS responded to multiple public comments on its carbon analysis as follows: [“The revised carbon supplemental report and associated Terrestrial Ecosystem Processes and Functions section of the FEIS address

these comments, including the short-term carbon emissions and loss of carbon stocks associated with mechanical thinning treatments. It also evaluates the long-term changes in carbon stocks and sequestration in areas that experience restoration treatments (including mechanical treatments) and are impacted by stochastic events such as tree mortality from uncharacteristic wildfires. The carbon supplemental report is a robust analysis that supports our analytical conclusions, and it has been updated to address public comments.[rdquo]

I do not agree that the public comments have been adequately addressed. USFS also asserted it need not consider scientific studies that included data drawn from areas outside the Sierra Nevada region but did not explain why data drawn from other regions would necessarily be irrelevant to the issues in question. Nor did seemingly USFS address comments raising its failure to complete a full life-cycle analysis of carbon impacts, or the lack of alignment between the conditions in the studies that USFS relied on to estimate carbon impacts and the thinning contemplated in the plans, which would allow removal not only of small-diameter trees, but also of trees under 30 inches in diameter.

Furthermore, in April of 2022, President Biden issued Executive Order 14072 which recognizes the role mature and old growth forests play in combating the climate and biodiversity emergencies. Biden[rsquo]s order directs federal land-management agencies to inventory America[rsquo]s mature and old growth forests on federal lands and develop policies to conserve them as a cornerstone of U.S. climate policy. To [ldquo]tackle[rdquo] climate change and enhance resilience to it, section 4 of the EO also directs the Secretary of Agriculture to participate in a process to [ldquo]identify key opportunities for greater deployment of nature-based solutions across the Federal Government[.] [rdquo] I am concerned that USFS is proceeding with plans that lack adequate protections related to tree diameters to ensure that mechanical thinning operations do not result in adverse carbon impacts, and that such operations will result in the loss of trees that should be cataloged and conserved, not cut, and will foreclose opportunities to prioritize nature-based solutions to reduce emissions and improve resilience.

Suggested resolutions:

USFS should more explicitly and completely analyze the carbon impacts associated with its decision to allow mechanical thinning of trees up to 30 inches in diameter. USFS should also explain why data drawn from areas outside the Sierra Nevada region is not relevant, rather than offering the conclusory assertion that it is not relevant. USFS should explain why the relevant phenomenon or process at issue would necessarily function in a substantially different way within the Sierra Nevada region compared to the area at issue in the study that USFS is discarding on that ground.

USFS should also revise the plans to ensure that they are consistent with, and do not foreclose or inhibit implementation of EO 14072 in any manner. Additionally, in tandem with inventorying mature and old trees under EO 14072, USFS should help expedite development of a robust Administrative Rule to provide durable, enforceable protection for mature and old-growth trees.

In light of the profound disagreement among experts regarding best methods for optimizing forest resilience and carbon carrying capacity, USFS should apply the precautionary principle: [ldquo]Take action to avoid the possibility of serious or irreversible environmental harm even when scientific knowledge is incomplete or inconclusive.[rdquo]

This means that in the Final Record of Decision for the revised forest plans the USFS should prioritize mechanical thinning and related management interventions in and near the wildland-urban interface (WUI), not in roadless or backcountry areas. That way, if it turns out that the USFS carbon carrying analysis is correct, the agency will have concentrated its scarce resources for management actions where they will have the greatest benefit. Conversely if empirical evidence reveals that logging and mechanical thinning are not helping reduce wildfire risk or are increasing it[mdash]this will be more readily noticed by both managers and community members, allowing USFS to adapt its management methods more quickly.

#### 1. The Wilderness Evaluation and the Recommendation Process are Flawed.

I am extremely disappointed to see no change in wilderness recommendations resulting from public comments in the RDEIS. In the Draft Record of Decision only 4,906 acres (about 0.58% of the final 841,700-acre inventory of wilderness-quality lands on the Sierra and Sequoia National Forests. Alternative C, as currently written, would recommend 466,215 acres across the two forests (about 55% of the final inventory), including many, but not all, of the most deserving areas. The agency produced hundreds of pages of documents yet does not anywhere reveal how decisions were made to choose the one area in the preferred alternative over any of the other roadless areas. The analysis fails any reasonable test of good science or sound methodology. The methodology is not rigorous, not consistent, not repeatable, not fully transparent, and not quantifiable.

USFS[rsquo]s inadequate analysis of carbon impacts, described above, underlies part of its rationale to recommend no wilderness on the Sierra National Forest and a miniscule amount on the Sequoia National Forest. To justify recommending zero new wilderness protection for the Sierra National Forest, the draft Record of Decision states:

[ldquo]I carefully considered tradeoffs and input on managing areas as recommended wilderness and managing them as other land allocations. Tradeoffs include restrictions on fuels management, wildland fire management, post-fire recovery, and climate change resilience activities. I believe such uses and options for future uses and management provide valuable contributions to the multiple use mission of the Forest Service and should continue. In this decision, my aim is to ensure that the Sierra provides access for a wide range of recreation experiences including all anticipated types of uses and number of users, while integrating values related to wilderness with the other values and benefits the Sierra provides.[rdquo] (emphasis added)

Wilderness protection, and managing roadless areas as if they were wilderness, are among the best ways to maximize short- and long-term forest carbon carrying capacity. Because wilderness areas are allowed to exist with nature as the dominant force, they are arguably the richest and most stable carbon sinks within our forests. Wilderness areas are the least actively managed and most likely the least costly forest land category. Large,

commercially valuable trees—which also store the most carbon—are not removed. Snags valuable to wildlife are not removed. Wildfires are often allowed to burn, reducing fuel loads and providing ecosystem benefits. In short: more wilderness protection will strengthen forest carbon carrying capacities and reduce management costs at the same time.

Absent a more complete analysis of carbon impacts, that fully accounts for the carbon impacts of mechanically thinning trees up to 30 inches in diameter, the USFS's assessment and balancing of the factors above, such as "climate change resilience activities," is flawed and cannot provide a rational reason for not recommending areas for wilderness designation.

Suggested resolutions:

In the Final Record of Decision for the revised forest plans:

1. Provide a clear explanation of the methodology used to determine whether or not to recommend wilderness-quality areas for wilderness protection.
2. Recommend for wilderness at least all areas included in Alternative C for recommended wilderness.
3. Require all remaining roadless areas not recommended for wilderness protection in the plans to be managed and protected as de facto wilderness.

I appreciate the opportunity for review and possible resolution of issues contained in this objection prior to the approval of the final plan. I look forward to an opportunity to discuss my concerns with you.

Sincerely,

Anne Henny