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July 28, 2022

To: Deputy Reviewing Officer

Deputy Regional Forest Elizabeth Berger  
USDA Forest Service Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592

Subject: 2022 Land Management Plan for the Sierra National Forest Plan Revision-Objection under the responsible official, Forest Supervisor Dean Gould.

**My objection issue:** The 2022 Sierra National Forest Land Management Plan language under Tribal Relations and Uses, Desired Conditions 02, Page 94, states: *"The Sierra staff coordinates with Tribes in managing traditional cultural properties, resources and sacred sites where the historic preservation law alone may not adequately protect resources or values"* (Plan Language). This Plan Language should be deleted or made perfectly clear that pre-existing recreation facilities or uses and other pre-existing entities are not subject to any possible mitigation measures, and will not preclude NHPA law in any manner. The following supports my Plan Language Objection:

If the Sierra National Forest is going to manage Traditional Cultural Properties (TCPs), resources, and sacred sites where historic preservation law of the National Historic Preservation Act (NHPA) does not protect them; does this mean that other resources such as pre-existing recreation facilities could possibly be unprotected where historic law (NHPA) now protects them? This Plan Language implies Forest staff personal can make up their own laws, regulations, and policies as they go along without any legal laws, guidelines protocols, rules etc. to go by. If so, wouldn't this action be unlawful, inconsistent, and conflicting with Forest Service regulations, policies, and required NHPA Historic laws? Should there be a required NHPA Section 106 review, since the Plan Language directly mentions historic law and thus, the possibility of adversely affecting historic properties?

The apparent basis for this Plan Language is the Sierra National Forest Final assessment Snapshot of 2013, Chapter 13, for understanding a need to change that states: *"Historically, Region 5 and the SNF have viewed cultural resources through the framework of legal compliance with Section 106 of the NHPA"*, and the condition for a need to change states... *"many existing recreation facilities are currently located on or near cultural resources their impact free management is problematic"*. This language supporting a need to change Section 106 of the National Historic Preservation Act that protects pre-existing recreation resources and uses i.e. "impact free", is obviously not lawful and severely conflicts with NHPA law, Forest Service regulation and policy. How can there be any legal basis for precluding or changing the NHPA ("historic preservation law") as indicated in the assessment and implied in this Plan Language?

The definition of a Traditional Cultural Property (TCP) and all Historic properties is that their integrity is not affected by pre-existing recreation conditions i.e. "impact free", or they would not be defined as a

TCP under the NHPA. Forest Service Policy FSM 2363.17 states TCP's are to be managed under the authority of the NHPA.

For a Mono Hot Springs Resort, April 1, 2011, permit public scoping review, there was a comment that the resort was adversely affecting a nearby TCP. The Supervisor's rebuttal comment left no doubt that pre-existing conditions cannot affect a TCP by stating: ...*"Had Planas or you identified that there were adverse effects to the integrity of the TCP during the evaluation and consultation process, the results would most likely had a profound impact on the nature and number of contributing elements, as well as the physical boundaries of the TCP"*.

My comments of September 22, 2019, for the 2019 Draft Revised Sierra National Forest LMP included two issues: #1 being appendix D with language stating, *"Management strategies can be applied to new or existing sites and whenever a conflict between recreation use and resources are detected"*, and some of the direct action management taken can be the to *"decommission facilities and permanently Discontinue visitor use"*. The appendix D was deleted by Forest Service.

My second September 22, 2019 comment, issue #2 was regarding the same Plan Language of this 2022 objection process under Tribal Relations and uses, Desired Conditions where there was a oversight in that my comments were never acknowledged or commented on by the Forest Service. Only my #1 comment received a reply that was mistakenly under Tribal relations and uses. My 2019 #2 comments should have been under Tribal Relations and uses (please see the enclosed comments).

I commented in 2019 that the objection Plan language supported the deleted appendix D language and therefore should also be deleted.

In review, because the Plan Language is so broad, lacking guidelines, arbitrary, potentially conflicting with Section 106 of the NHPA, Forest Service regulations and policy, I recommend the Plan Language be deleted or revised in such a manner that it is clear that existing recreation facilities and other pre-existing facilities and uses will not be affected by this Plan Language, and nor will NHPA law be precluded in any manner.

Please find enclosed copies of my previous Sierra National Forest LMP substantive formal comments that allow me eligibility for this objection process.

Thank you for the opportunity to object to 2022 Sierra National Forest Land Management Plan Revision,

Jeff Winslow,



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## 2019 Sierra National Forest Revised Draft Plan

1 message

Jeff Winslow <monohotjeff@gmail.com>

Wed, Sep 25, 2019 at 10:04 PM

To: r5planrevision@fs.fed.us

Cc: fariba.hamedani@usda.gov

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September 22, 2019

To: Planning Team Leader,

Subject: formal comments for the 2019 Draft Revised Sierra National Forest LMP Plan (Plan):

I have two issues where I recommend the Plan language be deleted that may potentially compromise existing recreation facilities and uses to mitigate a resource conflict:

Issue #1: Appendix D should be deleted from the Plan for the following reasons:

Appendix D: Management Strategies for Resolving Recreation Resource Conflicts, states, "management strategies can be applied to new or existing sites and uses whenever a conflict between recreation use and resources are detected", and some of the direct action management taken can be the to "decommission facilities and permanently discontinue visitor use".

The apparent basis for this is the SNF Plan Final Assessment 2013, chapter 13 for understanding a need to Change that states: "Historically, Region 5 and the SNF have viewed cultural resources through the framework of legal compliance with Section 106 of the NHPA": And the conditions for a need to change states..."many existing recreation facilities are currently located on or near cultural resources and their impact free management is problematic". The following are my comments:

1) The very definition of Traditional Cultural Properties and all Historic Properties is that their integrity is not affected by pre-existing conditions (existing recreation facilities and uses) or they would not be defined as a TCP or historic property under the NHPA. Forest Service Policy defines all resources as historic until formally evaluated otherwise and requires the TCP's to be managed under the NHPA. Therefore, the NHPA protects existing facilities from mitigating measures as verified in the FS Plan assessment as "impact free". There can be no legal basis for changing NHPA, as indicated in the 2013 Assessment.

The following were my question to Fariba for the Virtual Meeting; however, just prior to the meeting she had assured me that the inclusion of Appendix D was mistakenly included and will be deleted.

1) How is it that the singling out of recreation facilities under Appendix D to protect historic properties and much less non-historic properties is not conflicting with the NHPA and purely arbitrary?

2) Why is it that the INYO National Forest deemed appendix D inappropriate and removed it from their 2018 LMP but the Sierra/Sequoia National forest has not done the same?

3) Why did the Forests include biology as a sensitive resource along with cultural resources in Appendix D since they are completely different resources governed by different laws regulations and policy? And is not this inclusion of biology that may also preclude present laws, regulations, and policy, just as likely to be detrimental to existing facilities (trails, roads, resorts, campgrounds, etc.)?

Again, as I conveyed to Fariba, the appendix D language should be deleted and she concurred.

Issue #2: Plan language under Tribal Relations and uses, Desired Conditions, 02, page 81, states:

"The Sierra staff coordinates with Tribes in managing traditional cultural properties, resources and sacred sites where historic preservation law alone may not adequately protect resources or values"

This language, as is Appendix D, must also be based on the 2013 assessment language stating: "many recreation facilities are currently located on or near cultural resources and their impact-free management is problematic".

During Virtual Offices hours, my main question to the FS was since Section 106 of the NHPA exempts existing recreation facilities from being subject to resource conflict mitigations measures: "impact free"; does this Plan language preclude the law and FS policy and potentially impact existing recreation? The FS answer to this question at the Virtual office meeting



was not exactly clear, but, I took the FS answer to be a Yes: it was explained certain existing recreation facility maintenance work that may perceivably affect any kind of Native American resources (non-historic sites (obsidian chips) or historic TCP sites) could potentially prompt mitigation measures (unspecified) against pre-existing recreation facilities and uses.

This was the basic theme in the Plan's Appendix D that will be deleted.

If an existing recreation facilities maintenance project is ground-disturbing in such a manner that it is considered an action, NEPA and Section 106 are required. How does this Plan language square with NEPA, NHPA (Regional PA) and FS Policy?

This language is so broad as to give Forest staff a blank check to arbitrarily make up their own rules, laws, and policy as they go without any guidelines, directions or protocol. How can any resource be affected without NEPA and Section 106 review that requires public involvement? All resources are considered historic until formally evaluated otherwise. Under Cultural Resources, page 82, states "A myriad of federal law, regulations, and policies direct the documentation and management of cultural resources". So, why is it necessary for effectively more rules and regulations?

It is apparent these desired conditions support the Appendix D language; therefore, these desired conditions should also be deleted along with Appendix D.

Because this Plan Language is so broad, arbitrary, unjust, lacking guidelines, conflicting with FS laws, regulations and policy, I recommend the above Plan language be deleted from the Plan.

Thank you for the opportunity to comment on this Draft Sierra National Forest Revised Land Management Plan.

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Start a new one

**Subject: comment for the 2016 Draft Revised Management Land Management Plan for the Sierra National Forest (Plan):**

The Plan's Living Final Assessment Snapshot & 7/2/2013 for Forest Assessment-Chapter 13 (Plan Assessment): Assessments are for understanding conditions for a Need to Change, Page 20, states: "Historically, Region 5 and the SNF have viewed cultural resources through the framework of legal compliance with Section 106 of the NHPA" (Note: this is the law).

A condition for a need to change for: "Recreation USE", page 22, in part states: "Cultural Resources are impacted by a variety of recreational activities; however, direct physical damage is generally the most destructive. Many existing recreational facilities are currently located on or near cultural resources (obsidian chips, TCP's and Contemporary Native American use etc.), and their impact free management (in accordance with laws, regulations & Forest Service Policy) is problematic".

All resources, including obsidian chips, are protected by several laws and FS policies without affecting existing recreation facility resources: ARPA and NAGPRA prohibit public removal of artifacts and funeral objects. FSM 2360 Heritage Policy protects resources in several ways to reduce or eliminate *natural and human effects*; one method of protecting obsidian chips is burial and other options.

The Plan assessment, page 1, defines Cultural Resources for a need change, by reference to FSM 2360, as any artifact, heritage resource and recreation facility: any definite location of human activity, occupation, or use etc. regardless of historic status.

**My comment:** In support of the above Plan Assessment stating many existing recreation facilities "impact free management is problematic", the Plan, potentially compromises existing recreation facility resources for perceptively impacting other resources that are mostly common obsidian chips that can be easily scattered around by anyone, Traditional Cultural Properties that by lawful definition cannot be affected by existing facilities, and Native American Contemporary use areas (a new twist in subjectively defining "sensitive resources" where "conflict" claims could easily be made to seriously affect existing or new facilities). Any Forests action applying Plan strategies that mitigate existing facility uses whenever a subjective so called conflict between recreation uses or sensitive resources is detected is inconsistent with historic law (NHPA), Forest Service Policy and is outrageously unjust to facility owners and recreation users.

### Here is how the Plan language compromising existing facilities works:

There are basically two types of sites or resources: *first*, the most plentiful sites are **non-significant Sites** (non-historic) commonly called *sites, archaeological sites, cultural sites, lithic scatters, or resource etc. and are not protected by historic law (NHPA)*: as an example, the numerous obsidian chip sites scattered everywhere by the public can be called a site even when recorded next to a recreation cabin and assessed as likely imported with no integrity. *Second*, **significant sites** (historic sites) are required to meet National Register criteria of significance (have scientific value) and integrity (must not be affected by existing development). Historic sites are legally protected from the effects of new ground disturbing development, not existing development, and do not necessarily stop a project but calls for consultation requiring a fair mitigation agreement that usually translates into site data recovery.

In accordance with historic law (NHPA) on Federal administered land, a sites integrity is always evaluated for affects by existing facility developments: highways, trails, pack stations, power dams, resorts, ski operations, campgrounds, multi-story buildings, Yosemite Village etc.: if an ***existing*** facility impacts a site then the sites integrity is compromised and the site is not considered historic (not protected under the NHPA), thus, under historic law, ***existing*** facilities are not subject to resource impact mitigation action. If a Forest evaluation analyzes a site as not being affected by an existing facility, thus, the site is historic (lawfully defined as not affected by facilities) the ***existing*** facility can just carry on operating as usual without ever affecting the historic site. Under historic law, it is a catch 22 to claim an ***existing*** facility operation impacts a historic site.

The public is often unaware or confused about the differences between historic (significant) and non-historic (non-significant) ***archaeological sites etc.*** and how they are treated in accordance with present laws, regulations and Forest Service Policy. In the past, the Forest has proclaimed that non-significant obsidian chip sites are significant even when the Advisory Council of Historic Preservation challenged their assessment and the Forest's own site survey evaluations specifically states otherwise. The Plan language that characterizes all resources as "precious resources" conveys the impression that all sites are significant.

Since all Historic sites (TCP's, Archaeological sites etc.) are legally defined as not affected by ***existing*** development, the question should be asked: how is the Plan

strategy that mitigates existing and new recreation facility uses to protect any kind of cultural resource and “other resources” rationale or consistent with Forest Service Laws, regulations and Forest Policy.

Guided by historic law, artifacts (obsidian chips, etc.) are protected by Forest Service Policy (FSM 2360) without affecting recreation facilities: common non-historic obsidian chips protection includes burial. The Forest never exercised this option to protect obsidian chips found on resort and campground property. But, illogically the Plan language protects common obsidian chips with a strategy that leaves them in place and limits facility activities to what enhances the public understanding of the common *non-significant* obsidian chip resources, i.e. the effective transitioning of recreation resources for tribal use interest.

Obviously, the Plan does nothing to protect resources but instead effectively converts recreation facilities use to *tribal interest use* (possibly for a non-profit group) that terminates valuable public recreation opportunities. A Supervisor’s letter to me December 7, 2016 states, “The plan components would operate in the decision space in areas not already covered by law, regulations and policy”. So, where is the “decision space” that does not protect obsidian chips?

The potential compromising of “many existing recreation facilities” and activities for another groups benefit is based on the false pretense that even though many laws and policies already protect Cultural Resources, they are somehow inadequate: maybe the laws and policies are only inadequate for those with an agenda and goal to transfer control of recreation facilities. Again, the above clearly demonstrates that Plan strategies to mitigate existing recreation facility use only accomplishes a potential taking of recreation facilities resources for tribal interest and does little or nothing to protect “precious resources”.

It is wrong that Plan strategies can potentially mitigate recreation businesses: present laws, regulations and Forest Service policy protect existing facility resources, i.e. “impact free”, and for good reason. How totally irrational is the compromising of existing recreation uses to protect common obsidian chips that anyone can throw around anywhere. It is a very serious action for the Forest to advocate the opposite of current historic laws and forest policy with Plan strategies that essentially unprotect existing recreation facility resources in favor of perceptively protecting “other resources”. The fact that the Plan language goes to the extreme of advocating *mitigating* recreation



uses to protect obsidian chips or any “resource” is outrageous. The wording **Mitigate Recreation Uses**, in the context of the Plan that imposes potentially extreme punitive action against recreation operators and the public should not be taken lightly: all Plan language that suggests mitigating recreation facility uses should be deleted from the Plan.

The Plan’s definition of Cultural Resources also includes all recreation facilities: does not the Plan protect the condition of Forest Permittee Partner Facility Resources for sustaining and improving quality recreation experiences? [FSH 1909-Land Management Planning Handbook, Chapter 10-Assessments](#) encourages expansion and enhancement of existing recreation and to offer new recreation opportunities; legitimate issues regarding Cultural Resources and areas of Tribal importance are addressed without suggesting the compromising of existing recreation facilities. The Plan language potentially compromising existing facilities conflicts with Forest Service policies and multiple use regulations and Forest 2012 Plan Rule where public recreation is a high priority.

All Plan language that potentially compromises existing recreation facility resource uses to protect any other kind of resource conflicts with historic law and Forest Service policy and should be deleted from the Plan.

### The 2016 Sierra National Forest Draft Revised Land Management Plan language of issue:

Under Desired conditions: Tribal relations and uses, page 43, states:

“The forest **coordinates with tribes in managing traditional cultural properties, resources and sacred sites where historic preservation laws alone may not adequately protect the resources or values**”.

My comment: it clearly stated in the Plan Assessment where the historic laws “may not adequately protect cultural resources (obsidian chips) or values (sacred sites)”: the answer: existing recreation facilities: FS/tribes manage obsidian chips or sacred sites on facility property; therefore, this component should be deleted from the Plan.

Under Desired Conditions: Sustainable Recreation (existing recreation) (required to be explicit and non-ambiguous), chapter 2, page 44, states:

"Cultural resources, traditional cultural properties and sacred sites are protected through project design and consultation with Indian tribes, tribal cultural leader and consulting parties".

**My Comment:** The above resource protections should be, as required, following NHPA law that exempts existing facilities from being subject to resource impact mitigation measures. This Plan component should be deleted from the Plan.

Under Potential Management approaches, Sustainable Recreation, chapter 3, page 89 states:

"Use management strategies to mitigate recreation use and resource conflicts"... (Appendix D). Appendix D, page 149, states: "Management strategies can be applied to existing (contrary to historic law) or new recreation sites and uses whenever a conflict between recreation uses or sensitive resources is detected. Sensitive resources include at risk species and habitats, riparian habitats, soil and watersheds, heritage resources and other resources".

**My comment:** clearly this Plan component states that existing recreation sites are subject to resource impact mitigation action that may severely compromise existing facilities. Also, the above strategy of mixing in of non-cultural resources (following the Plan Assessment) that are currently protected by a myriad of laws and regulations is inappropriate and where is the need to burden facilities with more subjective policy: **this Plan component should be deleted from the Plan.**

All the Management strategies for Appendix D: Perimeter Control, Presence and Direct Actions are worded to affect existing recreation facilities: for example: the direct action in part, page 149-150, states:

"Locate new facilities and areas for redistributing human use away from sensitive resources...;... if monitoring and evaluation indicate that closure is ineffective, take steps to decommission facilities and permanently discontinue facilities and permanently discontinue visitor use" (see attachment 1).

**My comment:** the total of the Appendix D actions, on page 149-150, (see attachment 1) are somewhat ambiguous that may work to the advantage of cultural resource advocates. Regardless, clearly most of the language is targeted at existing recreation facilities that could potentially compromise the very existence of a recreation facility and valuable recreation use; therefore, all these Plan components should be deleted, or modified to not affect existing or new recreation facilities directly or indirectly in any way.

Under Tribal Relations and Uses, page 90: states:

"Manage Mono Hot Springs to maintain a near-natural setting for traditional Native American use".

**My comment:** this appears redundant; this statement is in the 1991 LMP that preserves the natural concrete lined hot springs for Native American use that does not exclude others.

Under Design Criteria, Guidelines, chapter 4, sustainable Recreation, page 103 states:

"recreation Uses should be managed adaptively to prevent impacts to other resources and recreation setting, while considering the recreation place inventory; and redesign, restore, or rehabilitate recreation sites where recreation activities have caused unacceptable natural resource and social resource impacts." and Cultural Resources, page 104 states: "to protect the cultural setting of a site and visitor experiences, commercial use of heritage-based interpretive sites should be limited to activities that enhance the public understanding of the resource, protect and preserve the resource, and are consistent with tribal interest".

**My comment:** Clearly, this Plan language limits existing recreation facilities to activities that enhance the understanding of the resource (obsidian chips etc.) to be protected, and supports the Plan Assessment for changes resolving the "problematic" existing recreation facilities; therefore, this extreme Plan component that mitigates existing and recreation facilities uses should be deleted from the Plan.

Under Appendix B. Proposal and Possible Actions: Sustainable Recreation, page 138, states:

"Complete regular patrols at developed facilities to check for public safety and facility and resource protection".

**My comment:** this language validates that there will be Forests efforts to compromise developed existing facilities to protect resources; therefore, this Plan component should be deleted. And why is public safety thrown in here? Public safety is part of a permittees regular Forest inspection process where they are also subject to state and county rules and regulations: where is the need and does not this confuse the issues?

**My Conclusion comment:**

The above review is all about the Plan language that potentially compromises existing recreation facilities for tribal interest benefits even though historic law and Forest Service policy protects existing facilities from being subject to resource impact mitigation measures, i.e., Plan verified as "impact free". Regardless, it is outrageous that facility owners, particularly for Special Use Permit renewals or other changes, can be potentially subject to huge punitive financial concessions to protect resources like common obsidian chips that can easily be scattered on a facility by anyone, Traditional Cultural Properties that by legal definition are not affected by existing facilities, and other resources. And in addition to the previous plan draft, a new very subjective twist



in defining a cultural resource was created where *Native American contemporary use areas* qualify as a Plan protective resource that may compromise existing facility owners and users.

Bottom Line: Again, all the Plan language that could potentially compromise existing and new facility resources to protect any kind of "sensitive resource" (obsidian chips, Traditional Cultural Properties, Native American contemporary use areas, etc.) is wrong and should be deleted from the Plan without compromise.

Jeff Winslow  
Owner, Mono Hot Springs Resort  
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## Appendix D: Management Strategies for Resolving Recreation Resource Conflicts

Management strategies can be applied to existing or new recreation sites and uses whenever a conflict between recreation uses or sensitive resources is detected. Sensitive resources include at risk species and habitats, riparian habitats, soil and watersheds, heritage resources, and other resources.

Implementation of these actions would also take into consideration available funding and staffing. The actions and practices include the following:

### 1. Conservation Education

- Use information networks, including public service announcements, internet sites and links, and visitor guides and newsletters to communicate information regarding sensitive resources.
- Install and maintain appropriate multilingual information boards, interpretive panels and regulatory signs at developed sites and dispersed areas within sites of sensitive resources.
- Develop interpretive and environmental education programs about sensitive resources and habitats for the public, Forest Service personnel, concessionaires, other special-use authorization holders, and volunteers. Engage the services of special-use authorization holders that provide services to the public (e.g., concessionaires, organization camps, and outfitter guides) to assist in the development and delivery of these programs. Provide authorization holders with messages about sensitive resources and management issues so that they can use them to educate people. Ensure that the methods chosen do not result in unacceptable effects to sensitive resources. Coordinate efforts between national forests for maximum results and cost efficiencies. Use existing visitor centers where appropriate.
- De-emphasize the site or area and develop an information strategy to direct visitors to national forest recreation opportunities that do not affect sensitive resources.

### 2. Perimeter Control

- Modify visitor access to manage use. Install and maintain appropriate fencing or other barriers to protect sensitive resource areas. Limit the number of users at the site or area.
- Install and maintain appropriate multi-lingual informational, interpretive and regulatory signing, in conjunction with perimeter controls, to engage national forest visitors with protection of sensitive resources at recreation sites and areas.

### 3. Presence

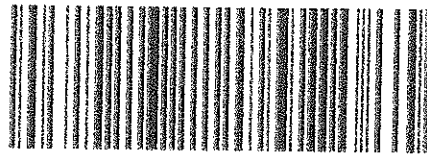
- Provide adequate management presence to ensure protection of sensitive resources. This presence could include Forest Service personnel, peer education, contractors, concessionaires, other permit holders, and volunteer support.

### 4. Direct Action

- Limit visitor use of recreation sites and areas through diurnal, seasonal or temporary closures during critical life periods for affected at-risk species.

- Where visitor use is allowed, seek opportunities to proactively rehabilitate, design, reconstruct, rehabilitate and harden the site; locate new facilities and areas for redistributing human use away from sensitive resources.
- Where visitor use is restricted, limit or control use at developed recreation sites and areas through permit system (e.g., group campgrounds). When other actions are ineffective, enact and enforce forest orders to protect sensitive resource areas through use of seasonal or temporary closures of developed recreation sites and areas. Seek opportunities to proactively design and locate new facilities and areas for re-distributing human use away from sensitive resources.
- Where visitor use is prohibited when seasonal or temporary closures are ineffective, enact and enforce forest orders to close recreation sites or areas. If monitoring and evaluation indicate that closure is ineffective, take steps to decommission facilities and permanently discontinue visitor use.

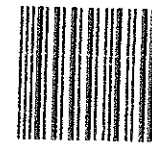
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**\$8.00**  
R2305M1286

Received ON  
03 AUGUST 2022

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