

Data Submitted (UTC 11): 11/7/2024 3:13:52 AM

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November 6, 2024

RE: Draft EA for the Sequoia
and Sierra National Forests
Prescribed Fire project

Dear Forest Supervisor Edwards:

As I read through the entire 218 pages of the subject Draft Environmental Assessment (EA), I made special note at page 29 and went on. I was curious about finding something better. I never did.

This project would pretreat and prescribe burn up to 2.4 million acres of the combined Sequoia (SQF) and Sierra (SNF) National Forests. The purpose seems to be reduction of wildfire risk. That is a popular idea as so many people have chosen to build homes and live in such fire prone locations.

But I found in this Draft EA occasional language that tells me this also is expected to allow removal of much timber and biomass for economic purposes within ¼ mile on both sides of permanent roads, temporary roads, and perhaps dozer lines and even handlines. This is nothing new for the US Forest Service (USFS). For example, I went on the Generals Highway from Big Baldy to the Sequoia National Park boundary in the last couple weeks. There in SQF I saw the sort of logging from which logs have been taken off the land. Another example I have seen is online at the website llovetrees.net. That website includes photos of recent, maybe ongoing, messy logging at Packsaddle Grove in the Giant Sequoia National Monument (GSNM). I have read that this logging in GSNM is being managed by Save the Redwoods League (SRL). In his amazing and shocking book, The Ghost Forest, author Greg King (2023) has revealed that SRL has always been a public relations arm of the timber industry.

The Draft EA has it that 50,000 acres of SNF and 32,000 acres of SQF will be pretreated and prescribe burned in 5-yr increments. If the entire 2.4 million acres were to be managed that way, the project would take 150 years to complete. And that would not be all. The Draft EA suggests that such prescribed fire would somehow prevent any large wildfires that might, with high intensity, burn more than 10% to 15% at high severity. Yet the Draft EA in various tables indicates that high severity fire is needed for ecosystem reasons, well maybe, on 10% to 15% in small patches.

I still believe that an Environmental Impact Statement (EIS) should ABSOULUTELY be required for this massive project proposed in your Draft EA. That would require disclosure of the amounts of work and tree removal, etc. The next best thing would be an individual EIS to disclose all those data for each 5-yr plan as they are proposed off into the future.

Now back to page 29 of the Draft EA. On that page is found the following:

"Result of Scoping: Issue Driving the Alternative,

Review of public comments from the scoping period resulted in the identification of one issue-driven alternative focused on the portions of the proposal that include managing in wilderness areas. One additional group of concerns occurring in the scoping comments focuses on the approach to planning and NEPA compliance that this project is taking. These can be laid out in short as follows: the project's scale and design require an environmental impact statement, that the use of a condition-based design for the proposed action does not allow for sufficient detail in analysis. Here, we briefly note that Forest Service NEPA procedures do not identify the type of actions proposed as those that normally require preparation of an environmental impact statement (36 CFR 220.5 (a), and FSH 1909.15, 21.2). The environmental assessment and associated planning process serve to meet the requirements delineated in 36 CFR 220.7 (a) and (b): specifically, to facilitate planning, decision-making, and public disclosure for proposals that are not categorically excluded from documentation and for which the need of an environmental impact statement has not already been determined. To support informed decision-making, the environmental assessment will disclose the likely effects of the three alternatives."

Hidden in this short section is, in my mind, an UGLY ROCK.

As I understand that section on p. 29, this project plan on which I am commenting is only a Draft EA as, per USFS, nothing in it approaches a need for an EIS. What would require an EIS is any actual implementation. But the USFS says that with current listed regulations there is a categorical exclusion for that part of the planning. In other words, USFS can carry out the implementation without informing the public of what they will really do.

The USFS claims to have a categorical exclusion from writing an EIS. Oddly, in the Glossary to this Draft EA the term EIS is defined, but the term EA is not. That makes me wonder if you really think it should be an EIS, while you follow direction from above.

I oppose this enormous plan which likely has the longest expected life of any US Government plan in history.

With that, I conclude my comments. There is no need to tell of other more technical shortcomings in the Draft EA.

Yours truly,

Richard E. Kangas