Data Submitted (UTC 11): 12/17/2024 5:03:01 AM
First name: Maya
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Organization:
Title:
Comments:
Dear Ms. Eberlein and others,

Please consider these comments in addition to my earlier comments, both objecting to the "Community Protection - Central and West Slope Project" (Project) Decision #2 (revised version). I am a biologist with over 7500 hours of experience in forests of the American West including California, am a homeowner and have experienced 2 evacuations during recent wildfires that came close to home. My comments need to reach you and all other responsible parties in USFS, including Richard Hopson, Acting Forest Supervisor, Plumas National Forest.

My main comment is that community protection cannot be achieved unless home hardening and defensible space measures are the main goal of a given project. If community protection is indeed the focus, a significant percentage of the proposed Project area and associated funds would be focusing on the 100-foot defensible space zone around homes and on home structures. The project's main goal appears to be forest extraction by means of thinning with use of forest materials for commercial purposes.

In addition, a project of the size proposed, which serious impacts to California spotted owl habitat, is anticipated to be serious enough that a simple EA, with inappropriate references, is wholly inadequate. The document of choice should be an Environmental Impact Statement (EIS).
The citation North et al (2022), is inadequate as the publication fails to acknowledge existing forest density variability. It appears that North et al being used to defend logging to lower the forest density, when there is historical data which clearly show the variable density of past forests. The stated "forest resiliency objectives" in the EA cite a publication by North et al (2022), which recommend removal/logging of forests to make them more "resistant" to climate change (fire, etc.). The authors based the idea on "historic forest data." But the data they used in the paper left out most of the available forest data in the archives, clear evidence of variable and higher forest density.

There seems to be no attempt to account for the GHG emissions associated with the loss of soil carbon and loss of tree carbon associated with large-scale removals, since they would result in higher emissions and to the intensity of future wildfires.

Mechanical thinning, followed by commercial use of the thinned materials, has recently been associated with fast and dangerous wildfires in California - the opposite of the stated purpose of protecting communities. Is the forest service aware of studies that clearly show that fire progression can (and has) occurred quickly through mechanically treated areas - therefore posing a huge risk to communities?

After the 2021 Dixie Fire, which burned through part of Plumas and Lassen NF, it was common to observe the stumps of large, mature trees in the foreground, which were removed as part of pre-fire projects, with multiple small trees that were killed by the fire in the background. The smaller trees in the background were not as fire-resistant; the larger trees had been removed pre-fire. It must be emphasized that the carbon losses/greenhouse gas (GHG) and other carbon emissions associated with mechanical thinning is being neglected - by assuming that those emissions would be offset by the growth of other forests and/or by post-removal "restoration" actions - which neglects (a) the time taken for regrowth and (b) the fact that those other forests would be growing regardless of the mechanical thinning actions.

The assumptions that wildfire would be prevented by mechanical thinning and other treatments, and that wildfire

emissions exceed mechanical thinning emissions, are untrue as proved by the science. Logging-related emissions have been proved to be 5-10 times more than wildfire emissions.

If the USFS is truly interested in addressing the issues at hand, the agency would prepare proper documentation in the form of an EIS. Please proceed with the proper documentation for the public to review.

Best regards,
Maya