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July 20, 2021

To: Objection Reviewing Officer
Intermountain Region
U.S. Forest Service
324 25th Street
Ogden, UT 84401

RE: OBJECTION AGAINST THE DRAFT DECISION AND FONSI FOR THE MARINE CORPS MOUNTAIN WARFARE TRAINING CENTER FOREST RESTORATION PROJECT

1. Objectors Names and Addresses

Katie Fite, Wildlands Defense, PO Box 125, Boise, ID 83701; phone 208-871-5738; email: katie@wildlandsdefense.org.

2. Name of the Proposed Project

Project Marine Corps Mountain Warfare Training Center Forest Restoration Project

3. Name and Title of the Responsible Official

Duncan Leao (Note: Names of Responsible Official and deciding Officer are not clear from the FS Notice in the newspaper). We do not know if Deciding Officer will be Duncan leao or Bill Dunkelberger, HT Forest Supervisor

4. Name of the National Forest the Project is Planned

Humboldt-Toiyabe National Forest

5. Name of the Ranger District on which the Project is Planned

Bridgeport Ranger District

WildLands Defense and out members use and enjoy the beautiful public lands of the Bridgeport Ranger District and the project area site for wildlife viewing, nature and wildlife photography, recreational enjoyment. Many of the species affected by this project – such as Brewer's Sparrow and other migratory birds like Northern Goshawk , are of special importance to WLD and our members, as they are constantly under assault with federal agency "treatments" destroying their habitats, and the preservation of these species is very important to sustaining native biodiversity that is a critical part of WLD's organizational mission.

Suggested Remedies

Because of the violations of the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), the Migratory Bird Treaty Act (MBTA), the Administrative Procedures Act (APA), and the Endangered Species Act (ESA), Objectors request that the Marine Warfare Project be withdrawn from implementation. These violations of these laws are identified below in our Statement of Reasons for Legal Violations.

Statement of Reasons as to how the Project Violates the Law, Regulation or Policy

WildLands Defense is filing this Marine Mountain Warfare Training Center Forest Restoration project Objection pursuant to 36 CFR part 218, Subpart A and B and any other applicable elements.

We are going to use the more detailed information provided in the June NEPA analysis for the Marine War Project to expand somewhat on issues, because we did not have access to this information when scoping comments were required. The failure of the Forest Service to provide the public with much more detailed information in this NEPA process, detailed information that would have been provided in the release of a draft environmental assessment/EIS and associated project information, limits the public's ability to respond to all potential concerns about a project. This deletion of an important step in the NEPA process for public involvement in a project of this magnitude means that the public has to respond to the additional information provided in the EA and draft decision without having provided comments on these issues in the scoping period. As a result, the failure of the Forest Service to provide a draft analysis for public comments essentially negates the requirement that an objection can only include issues raised during scooping. We have thus included a number of additional issues based on the additional information provided by the agency after the scoping period.

Also, because the Forest Service did not provide the public an opportunity to provide comments on a draft EA, the public has therefore been denied the essential part of the NEPA process of seeing how the agency has considered and responded to public comments and how the agency uses current scientific information in the context of public comment. The agency's Response to Comments as per a draft NEPA document is a critical part of public involvement, so that the public can see how their input was addressed, if in fact public comments were considered at all in the proposed project. We note the Forest sped ahead and released this EA at breakneck speed, even before the field trip requested with scoping has taken place – thus thwarting effective public input from site-specific observations – and this is critical since the EA is so vague about what the actual on-the-ground conditions are. This is particularly disturbing as we learned on the site visit that the Marines gave the Forest two million dollars for this project– it appears they are buying a fore-ordained conclusion for the project outcome. Further, the 2021 fire season, drought and general aridification of the West is now blowing past the old broken fuels and fire models that the antiquated agency plans and HT Forest management paradigms are based on- as described below. There is significant new and emerging environmental information since the NOPA.

WLD requested the Forest Service prepare an EIS for this major deforestation and wildlife habitat obliteration scheme for the USFS land being incrementally impacted by incrementally expanding Marine activity. We highlighted the scope of the NOPA's proposed scorched earth native vegetation destruction treatments radically disturbing an immense (18,000+ acre) land area across a 65,000 acre project area. The project area contains complex native vegetation communities that are home to a huge amount of native biodiversity in this landscape with sweeping elevational change. The EA proposes radical deforestation and shrub destruction through multiple and overlapping forest and shrub destruction methods that will greatly alter, destroy and fragment watersheds and habitats for native biota and scenic wild lands. We Object to the use of an EA for a 2 million dollar + project that will have major environmental impacts.

The project will make the lands MORE likely to burn and become overrun with weeds. It will have drastic adverse impacts on migratory birds, rare/ESA-listed sensitive species, watershed processes and ecological processes, water quality and quantity. It will greatly alter the microclimate making lands more at risk of fire. It will increase heat, will increase wind, will cause earlier site drying an longer fire seasons --- all by removing shade and snow-trapping and ground shading vegetation=. It will make sites windier so they dry out earlier with longer fire seasons. It will lead to invasion of flammable exotic species like highly flammable cheatgrass, whose invasion in wildland ecosystems is permanent and irreversible. We Object to the FS failing to candidly consider the fundamental changes that will take place, and be made worse by climate change stress – amplifying treatment risks and harms.

Th self-serving largely programmatic EA inflicts overlapping and often repetitive disturbances stripping and denuding native vegetation communities. See EA listing of thinning/cutting, mechanical heavy equipment cross-country travel soil disturbing and compaction, and erosion causing weed-spreading grinding up native woody vegetation with "mastication" – which also disturbs and displaces rocks and damages and destroys cultural artifacts.

Either alone or heaped on top of cutting, mechanical, grazing disturbance – the project includes rampant burning. This includes scorched earth pile burning, scorched earth jackpot burning and prescribed burning. The EA also relies upon incessant grazing by unspecified livestock type - inflicting heavy to severe disturbance that will inevitably cause more flammable cheatgrass and other flammable as well as noxious weeds– on top of the highly damaging and destructive FIM permitted domestic sheep grazing already taking place here.

The project is mis-labeled "restoration" when it should be described as "destruction". In fact, every FS manipulation action claimed to be "restoration" is really destruction of mature and old growth native vegetation communities, and/or will cause greater weed proliferation - such as the scheme to graze MORE livestock on top of the highly abusive sheep grazing already taking place spreading weeds, polluting waters, gnawing down sagebrush and native wildflowers and spreading numerous diseases. Perhaps the aim is to degrade the lands and make the public care less about the highly disturbed degraded areas so the Marines could more readily expand military activities- because the public will have forsaken the weedy fire prone wastelands that this project will have created.

We Object to the failure to take a science-based hard look under NEPA at the context intensity, scope, scale and magnitude of the project's impacts on all elements of the environment, and the serious risk of making ecological conditions much worse – weedier and more fire prone and species habitat fragmented, altered, destroyed and populations plummeting or being wiped out all together as treatment (fire, mastication, chopping

down, and grazing – often overlapping) all take place in a landscape undergoing unprecedented climate change stress amid the western megadrought.

Instead of focusing on very specific areas, and addressing Marine facility and site interfaces, the project proposes to squander huge sums and roam over areas distant from roads and into the backcountry with radical thinning, chopping, and burning activities that will ultimately make lands more fire prone. This is the very opposite direction that the FS should be going. The EA ignores the stupidity of conducting massive wild country treatments if one is trying to protect specific areas. See for example, Jack Cohen on defensible space. https://www.youtube.com/watch?v=vL_syp1ZScM .

The project's entire basis and the underlying fire return and disturbance models are mired in the past. They are based on old, out-dated information on both vegetation communities and common sense observations of fires and how they burn in western forests. The project, and those pushing it, are blind to the current and advancing status of scientific knowledge about how projects like those in the EA make lands much more likely to burn across vast areas. Bradley et al. 2016.
https://www.researchgate.net/publication/309472850_Does_increased_forest_protection_correspond_to_higher_fire_severity_in_frequent-fire_forests_of_the_western_United_States .

"*We found no evidence to support the prevailing forest/fire management hypothesis that higher levels of forest protections are associated with more severe fires based on the RF and linear mixed- effects modeling approaches. On the contrary, using over three decades of fire severity data from relatively frequent- fire pine and mixed- conifer forests throughout the western United States, we found support for the opposite conclusion—burn severity tended to be higher in areas with lower levels of protection status (more intense management), after accounting for topographic and climatic conditions in all three model runs. Thus, we rejected the prevailing forest management view that areas with higher protection levels burn most severely during wildfires*"

A July 16, 2021 article in *Governing , Scientists Say Clearing Forests Worsens Wildfire Damage* https://www.governing.com/now/scientists-say-that-clearing-forests-worsens-wildfire-damage describes:

"Wildfires aren't caused by forests, but the default approach to fire prevention is to clear them. Climate may be the real problem, and preserving trees a big part of the solution …".

"*Logging changes the microclimate of a forest and creates a microclimate that is more conducive to the spread of flames and more intense fires, when a wildfire occurs. A dense forest that has a lot of trees and a lot of biomass also has a high canopy cover and it has a lot of cooling shade from that canopy cover. The trees, alive and dead, and the downed logs soak up and retain huge amounts of moisture and soil moisture.*

You have a lot more water in the system overall, even in the ambient air. The ambient air temperature is lower and the relative humidity is higher. The higher level of tree density acts as a windbreak against the winds that drive flames. Everything stays more cool, more moist, more shaded.

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"That narrative is being used and weaponized to target logging projects at old growth forests and some of our most ecologically sensitive and vulnerable forests, based on the idea that those are the most so-called overgrown," he says. "Not only will this damage wildlife habitat and make climate change worse, when fires burn those areas again, they will burn more intensely."

When logging occurs, you reverse that. The canopy cover is reduced and this creates hotter, drier and windier conditions. In addition, logging equipment spreads highly combustible, invasive gasses and leaves behind kindling like slash debris, which is also highly combustible". [Logging impacts are similar to thinning in the context of the Marine War project arsenal of disturbance and atmosphere polluting and carbon sequestration loss consequences. BUT the Martine War actions are even worse. There is extensive additional burning and scorched earth increased grazing disturbance under the EA umbrella as well].

AND regarding the importance of forest carbon storage: *"... our biggest bang for your buck is forests in terms of carbon absorption, and most of the forests in this country and around the world have far less carbon in them than their biological potential because of decades of logging".*

An Oregonian (logging friendly newspaper) article summarizes aerial images from the 2020 labor day fires. The aerial images showing logged and roaded conditions of areas rapidly burned in wildfires, and reports even in the logging-friendly *Oregonian.*

https://www.oregonlive.com/wildfires/2020/10/oregons-labor-day-wildfires-raise-controversial-questions-about-how-forests-are-managed.html

"*That is an amazing event, absolutely an amazing event," Chris Dunn, a former firefighter who now studies fire at Oregon State University, said from his seat in the Cessna. "Looking around Blue River and the sheer devastation to the community and the level of crown fire that was down around that basin…It really blows my mind."*

As for the industrial timberlands surrounding the community, which are systematically logged, reforested, thinned and managed as crops, he said, "I think it's pretty clear that this level of intense management didn't aid the community in any way."

And: *"... forest management," usually some combination of logging, controlled burns and underbrush removal. It's trumpeted by President Trump, the wood products*

industry and to a lesser extent, by Gov. Kate Brown, who has explored it as a way to reduce fire risks on some 5.6 million acres over the next 20 years.
But for Oregon's westside forests, such large-scale treatments may be ecologically impractical, economically unfeasible, or flat out ineffective.

Oregon's Labor Day fires took place on some of the most heavily logged timberlands in the state. And when it came to saving trees, lives and property, that management was largely irrelevant. In fact, some contend it may have made the problem worse".

The July 2021 Klamath Bootleg Fire is ripping through extremely heavily logged and manipulated lands – Fremont-Winema Forest and private. The logged out, cut over, extensively roaded, heavily manipulated forest is blazing away. An excellent summary is found here Bootleg Fire, pyrocumulus clouds and biomass logging?
: https://forestpolicypub.com/2021/07/15/bootleg-fire-pyrocumulus-clouds-and-biomass-logging/?sfw=pass1626495264&fbclid=IwAR0HxZheAhQh-_33TKTXLCvOU1asPTE4m-AcZlmChfnePm2tzogGlzv2YKU

"The project impacted by the #BootlegFire, ACR273, is a 400,000 acre forest project that was recently harvested for timber and has earned more than 950,000 offset credits from California's climate regulator as ot regrows". https://acr2.apx.com/mymodule/reg/prjView.asp?id1=273

AND: "*The fire is exploding through heavily logged lands belonging to Green Diamond Resource Company, holdings that are registered as an offset project for California cap-and-trade as well as been committed to provide feedstock for the unicorn #RedRockBiofuels project in #Lakeview*".

There is an excellent link to maps of this heavily logged and manipulated area over time in this area. By "treating" and radically disturbing and destroying complex native vegetation communities – the FS will make the project lands much more likely to burn - including in weather-driven mega-fires.

Also: https://www.governing.com/now/scientists-say-that-clearing-forests-worsens-wildfire-damage

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"Wildfires have an important role in ecosystem processes, but the hotter, drier weather resulting from climate change creates conditions that make them more likely. Human incursion into forested areas, and their behavior once there, also creates fire risks. Humans are responsible for starting 84 percent of all U.S. wildfires, and 97 percent of those that threaten homes. Researchers from UC Irvine found that fires caused by humans spread twice as fast in California forests as those caused by lightning".

[NOTE that clearing denser vegetation will make it easier for people to drive and park off roads, and to drive cross-country, thus exacerbating fire risk from vehicle fires, or with cleared areas – target shooting or other human-caused fires].

AND: "*Chad Hanson, Ph.D., an ecologist who co-founded the John Muir Project, is a prominent member of a growing community of scientists who challenge the notion that practices such as thinning and clear-cutting back-country woodlands will reduce the severity of wildfires. In a new book, Smokescreen: Debunking Wildfire Myths to Save Our Forests and Our Climate, he describes how recent research regarding fire behavior and ecology could provide the foundation for a new approach to forest management.*

"Hanson sees a dangerous political narrative developing, at state and national levels and among members of both political parties, based on an assumed association between forest density and risk. This notion has been refuted in numerous studies, including one that looked at 1,500 fires between 1998 and 2014.

"That narrative is being used and weaponized to target logging projects at old growth forests and some of our most ecologically sensitive and vulnerable forests, based on the idea that those are the most so-called overgrown," he says. "Not only will this damage wildlife habitat and make climate change worse, when fires burn those areas again, they will burn more intensely."

Most recently, Hanson used Forest Service data as the basis for a study of two large fires that occurred in California in 2020: the Creek fire and the Castle fire. The research, which will be published later this year, found that intensive forest management was most correlated to burn severity, not the density of snags or the length of time since the last fire in an area."

ALL of this information, and the information from the 2019 and other recent California fires and how they burned, from the fires burning through heavily logged Colville Reservation lands in Washington and so many other blazes in the West, demonstrate the flawed nature and fallacy of the EA's fuels models and premises. It is critical that an EIS be prepared to take a hard look before proceeding with irreversibly altering vast areas of forest and causing significant loss of sensitive species habitats (- just because the FS and Marine advocates of this project want to greatly thin forests and denser mountain shrubs, purge dead trees and clear the understory – the latter to an extreme degree – all of which current science and common sense are showing do not work and are highly likely to make matters worse along with causing serious habitat damage and fragmentation. This is further evidence an EIS must be prepared for this project, as it is necessary to amend the Forest plan and the Sierra Framework amendment and with this new vegetation, fire and common sense-based information, instead of artificial "desired' veg communities that are used as the basis for massive expensive "treatments". A hard look at the full spectrum of vegetation and fuels science must be taken before the FS irreversibly alters the Forest

lands and causes rampant weed spread from these treatments plus imposes intensified livestock grazing in an area under great fire stress and we object to the failure to do so. We Object to this critical analysis of all of these foregoing concerns NOT taking place in the self-serving EA with its out-dated models and its reliance on highly manipulated conditions – as for example, illustrated by the recent burning of long-cut wood piles scalding soils and adjacent forest vegetation (see later photos from Mill Creek watershed).

We Object to the failure to take a hard look at local weather patterns prevailing winds, and the frequent high winds including down-canyon and other winds that indicate embers will be spread over large areas, and the EA actions producing hotter, windier, drier, site conditions will make matters worse in the wake of the project. The fs is largely altering the lands on the east side of the project area – and is not protecting the higher elevation lands – as winds are predominantly form the West one would assume. There is no rigorous hard look analysis.

We Object to the EA's great lack of site-specific data on treatment site conditions like slope, aspect, distance to water, extent of riparian vegetation and type of species in riparian zones (including those the FS proposes to "treat" and disturb), the extent of previously burned/manipulated sites in and adjacent to each treatment area, and the amount of each veg type and veg community age category targeted for drastic treatment across the broader landscape. The latter is necessary to assess the relative scarcity of the affected resources.

We Object to the shallow EA's lack of basic data and analysis of current ecological conditions and stand (forest and shrub) structures, and the species supported by the complex existing woody vegetation structure. Where are all areas of old growth forest? How does the HT define old growth for all species, including shrub communities like sagebrush? Where are all mature stands of forested vegetation of each species type? Where are all exceptionally old/ancient individual trees? Where are all known rare species occupied habitats? What risks pathogens and potential harms does each treatment pose to mature and old growth plant communities? What are the effects of constantly disruption of natural plant successional processes? How is current and foreseeable livestock grazing affecting and disruption of plant successional processes? Where are nesting cavities for avian cavity nesters and native mammal species that rely on cavities? including species of special conservation concern? The EA is completely devoid of even the most basic information, and is the basic info and analysist hat should have been provided in a draft EA but regrettably the FS ailed to produce one and instead issued a padded programmatic NOPA instead, that is not really an analysis, and that only considers a single highly flawed alternative, i.e. the proposed action. It is laughable to believe that ONLY one possible alternative action would be possible for these the lands. The lack of any reasonable alternatives (addressing 'fuels" in the immediate vicinity of sites where Marines may start fires such as helicopter lands areas (which are not even revealed) and the main complex are ignored. Note – WLD's field visit observed cut off sage and masticated shredded trees by the Marine HQ. All that "treatment" did was

spawn cheatgrass (which thrived after shrubs were cut and trees masticated) and create hotter, drier weedier site conditions. See photos below. The lack of reasonable alternatives combined with the lack of a huge amount of baseline data and information o forest stands, specific wildlife habitat use of areas targeted for treatment, lack of info on mature and old growth communities, lack of info on current permitted grazing impacts to the environment, lack of information on existing and foreseeable Marine fire-causing activities, lack of info climate change stress being manifested in veg communities, waters, watershed across the project area and surroundings, lack of info on the megadrought, lack of info on current and emerging wildfire science and common sese about how fires burn, etc.

Re: marine fire-causing activities from V-22 engine exhaust being incendiary:
https://www.wired.com/2009/06/hot-breathing-osprey-sparks-five-acre-fire/

https://wildfiretoday.com/2009/05/30/osprey-makes-precautionary-landing-starts-fire/

https://www.pref.okinawa.jp/site/chijiko/kichitai/documents/risk%20of%20fire%20from%20v-22%20exhaust.pdf

https://www.pref.okinawa.jp/site/chijiko/kichitai/documents/risk%20of%20fire%20from%20v-22%20exhaust.pdf .

We Object to the failure of the Forest to take an honest hard look at the ongoing incremental and foreseeable expansion effects of the ever-increasing footprint of Marine war activities in this area and across the surrounding landscape.
The FS has even gone so far as to amend the Plan for a high elevation permanent marine war "communication site". Yet the FS has failed to amend the Forest Plan to designate RNAs, Zoological Areas, or other specially protected areas in the unique natural communities within the project area – such as groves of beautiful incense cedars.

Marine expansion:

2010. *... Towers at Mean Peak and Sweetwater, use multiple, very high frequency (VHF) radio nets. The geographic coverage provided by these systems does not adequately cover MWTC's 44,932-acre limited-use area. In addition, the current coverage does not extend to other authorized use areas east of the Sweetwater area to Hawthorne Army Depot*.

(Note this demonstrates a much larger footprint, too, than the project area itself. And the FS allowed these changes in areas of high scenic protections).

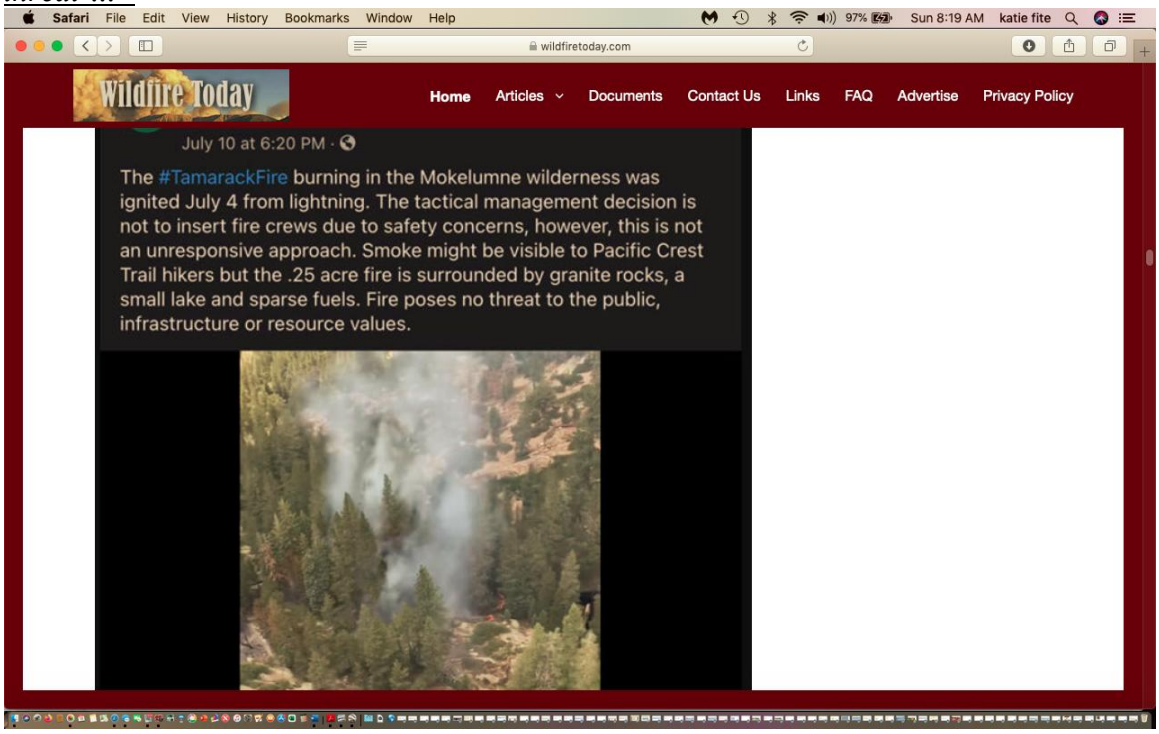
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd649457.pdf

2019. Amendment to the
Toiyabe National Forest Land and Resource Management Plan Mountain Warfare Training Center Communication Infrastructure Upgrades Project

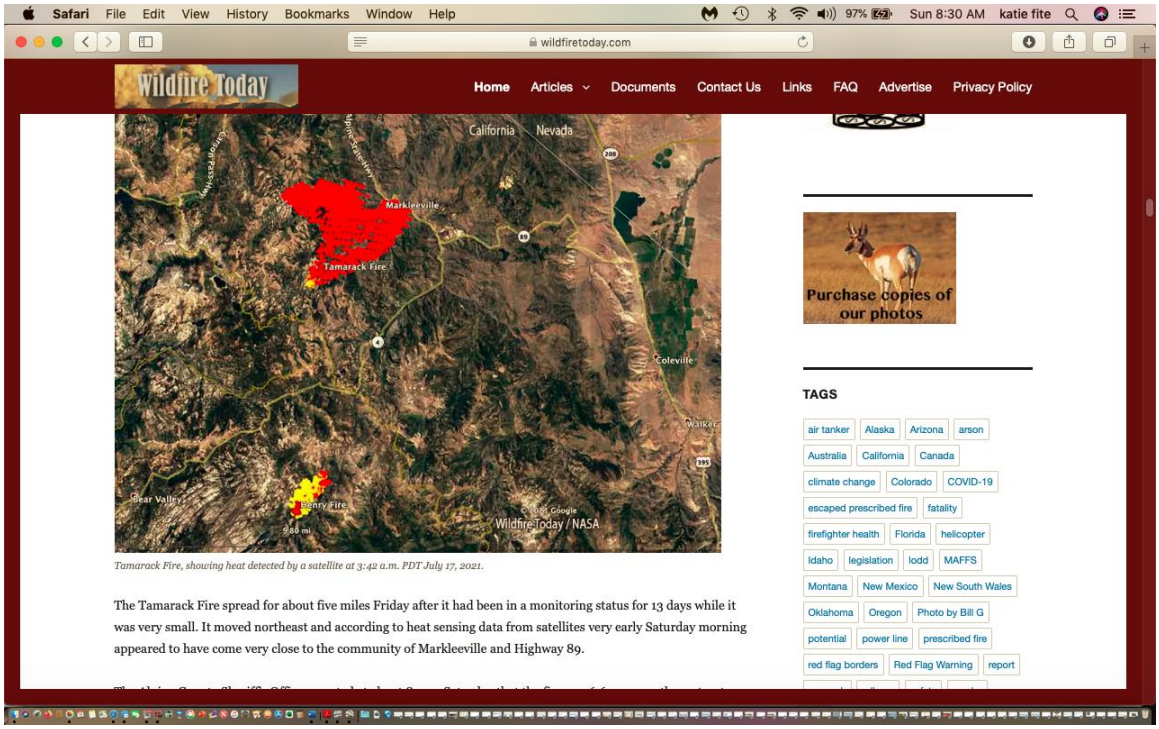
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd649479.pdf

We Object to the failure to take a hard look at the expanded wildlife disturbance and displacement and habitat fragmentation footprint of Marine activities due to stripping protective and screening native woody vegetation in migratory bird, sensitive species, big game and other wildlife habitats, and the worsened adverse effects and serious harms from inflicting massive disturbance treatments, plus "regular" permitted grazing, plus scorched earth livestock grazing following on top of treatments in the midst of the western megadrought. It is highly risky, as site recovery following treatment disturbance becomes even less certain across all the upland sites targeted for disturbance. The FS has failed establish criteria for addressing drought effects - and that includes NOT allowing "regular" domestic sheep to beat up the land as badly as they had done by in June 2020 already,. Sites are even more weed-prone, etc.

As we were preparing this Objection, the Wildfire Today reported on the Tamarack fire on the Humboldt-Toiyabe Forest that blew up from being a "monitored' tiny fire surrounded by sparse fuel to spreading five miles in one day. After 13 days, it blew up. *"Fire is surrounded by granite rocks, a small lake, and sparse fuels. The fire poses no threat …"*



Those "sparse fuels" and granite boulders couldn't stop the Tamarack Fire – proving that sparse fuels don't make any difference under the current conditions fires are burning in.



"The Tamarack Fire spread for about five miles Friday after it had been in a monitoring status for 13 days while it was very small. It moved northeast and according to heat sensing data from satellites very early Saturday morning appeared to have come very close to the community of Markleeville and Highway 89." Wildfire Today, 7/17/21

Also, we request that the FS review and include in the record the new Video with Chad Hanson describing Paradise Fire situation and GF claim that logging and tree thinning would protect them from fire, and that it was a "fuelbreak" Start at Video Minute 35. Yet the Paradise Fire that killed 85 people whipped right through the fuelbreaks which had given the Paradise residents a false sense of security. Minute 40. Beyond 100 ft. of structure, "treatments" make no difference. Defensible space is what matters. Minute 42. Emerging scientific evidence that thinned areas burn more intensely and fires move faster. Minute 47. Bond describes need for woody debris on the forest floor. It holds some water helping reduce fires and fire effects, is an important part of forest health, and downed logs are important wildlife habitat. Yet the Marine War EA seeks to destroy them. Minute 49. Chad Hanson describes the importance of downed wood and wildlife habitat, and erosion in thinned areas. Winds whip through thinned areas and drive flames more rapidly there because there are fewer trees to act as windbreak. Denser stands of forests act as a wind break against winds that drive the fire.

There is a cooler, moister, micro-microclimate because higher canopy cover in non-thinned forests – emphasizes the value of intact forest canopy.
Listen to: https://wildearthguardians.org/brave-new-wild/news/wildearth-webinar-fire-and-forest-ecology-in-the-american-west/

We Object to the lack of a hard NEPA look at current scientific evidence , and common sense understanding, that exposes many negative impacts from EA treatments. The FS arbitrarily ignores recent scientific understanding, and common sense. This NEPA deficit also makes it impossible to ensure adequate compliance with NFMA. The premise of the EA ignores common sense and growing forest ecologist expert consensus about the interaction of thinning and/or logging/tree removal and fire behavior, climate change and climate-driven fires in the megadrought.

The Forest's Plan paradigms are woefully out-dated. A hard look must be taken at this substantial evidence that the project will do just the opposite of what the EA claims -i.e. increase firesand weeds, and how this impacts FS sensitive species and species viability. A hard look must be taken at every element of the environment with the climate reality of 2021 front and center as the basis for any valid analysis, and we Object that this has not taken place.
water quality and quantity, climate change stress and vulnerability to climate change, loss of carbon sequestration from mature and old growth forest and shrub communities, crazed release of carbon into the atmosphere through all manner of burning, crazed loss of nutrients form the site through all manner of burning and increased and accelerated erosional processes due to project and livestock grazing soils disturbance and damage and destruction of protective microbiotic crusts that protect soils and prevent erosion, and act as a frontline defense against flammable invasive species, loss of site ability to buffer adverse effects of climate change stress, loss of habitats for native biota including species of concern, fragmentation of habitats for native biota including species of special concern, reduction and/or loss of populations and genetic diversity of native biota including species of special concern, damage/destruction/alteration of cultural materials and sites through direct and indirect impacts of the host of destructive treatments breaking and destroying material and the integrity of artifact and sites - including scorched earth pile burn and other ways the FS aggressively burns vegetation, , and through mastication cross-country travel by heavy equipment dislodging soil and rocks and causing erosion, and trampling/grazing/defecation and fouling by even more livestock grazing disturbance. The damaging chronic FIM operation grazing currently runs roughshod over this landscape, and adding even more grazing ostensibly for weeds, also threatens damage to or loss of unique vegetation communities and areas including those the FS has long failed to recognize as RNAs, Zoological Areas or other protected sites.
The project will also result in: Degradation of air quality - from burning, excessive wind-blown dust from deforestation and shrub removal and livestock run all over treated sites with minimal "rest". Thinning disturbance creates hotter/drier/windier/weedier sites as does livestock grazing denuding vegetation and disturbing soils including those in

“treated” areas. Just look at how the FIM sheep overran newly pile-burned areas in 2021. The project will result in accelerated and excessive rates of soil erosion and destruction of microbiotic crusts that prevent soil erosion, help prevent flammable cheatgrass and other weed invasion and sequester carbon. Crusts are readily damaged and destroyed through all forms of burning, operation of heavy equipment like masticators, and by FIM and any claimed “weed” grazing. Belnap et al BLM Tech. Bull. 2001. Shrubs and trees anchor/shade/protect plant communities, See for example, Prevey et al. 2010, Loss of Foundation Species [shrubs] increases population growth of exotic forbs in sagebrush steppe, and this is commonly observed with FS and BLM veg treatments and has happened on the Marine HQ facility site. Removing shrubs fosters weeds infestation and spread. This is vividly evident where the Marine site cut off sage and bitterbrush bordering the access route on their site, and cheatgrass now covers the ground surface.

Note Cheatgrass – by the gray dead cut off shrubs.

Cheatgrass in areas of exposed bare ground and hotter interspaces where protective shrubs had been cut back.

Bone dry ground up "masticated" woody veg (small tree?) above the Marine access route. On the field trip FS claimed that burning off pine needles helped reduce fire risk. Here, mastication has resulted in a carpet of flammable ground level vegetation, and a hotter, drier, windier more fire prone site. We Object to the FS failing to take any kind of rational science-based and common sense-based hard look at serious fire risks with this project's radical and often overlapping vegetation "treatments".

We Object to a lack of consideration and analysis of a full range of alternatives, including alternative action elements that we proposed. A full range of alternatives must be considered – including that the area in the immediate vicinity of any Marine structure ONLY be "treated" (see work of Dr. Jack Cohen and defensible space studies), and we object to the lack of consideration of defensible space including around helicopter landing sites and other areas instead of destroying the forest over dozens of square miles.

We object to the EA being woefully deficient in failing to consider how the Marines could minimize their fire-causing activity footprint. The marines must adapt and have contingency plans to train other places if there is fire – train outside fire season, conduct increased simulations for training that involves fire-risk activities (also- people are soon to be replaced by AI and robots in much military activity). Having the Marines pay for additional aerial fire suppression in the area sufficient to rapidly respond to fires must

also be considered to use the 2 million dollars on. War Game location adjustments in the event of a fire must be the accepted as the cost of using the site. Please provide records of the number of people training here, the number of flights, in the past 20 years for each year. How much training use is actually done by the 29 Palms Marines? How many outsiders train here? What other sites are used for training of, or similar to, this type? Where are all current analyses of the host of Marine activities and incremental expansion and habitat degradation and intrusions that have taken place here?

This Marine War deforestation stokes the climate catastrophe, and the project will irreversibly damage, alter, simplify and destroy habitats for a host of declining and rare native wildlife species, migratory birds, rare native carnivores and other wildlife. The FS EA has not provided information and analysis on the findings of current detailed multi-year intensive inventories for native species presence and occupancy across the Forest, so that the current status of species populations and habitats can be understood.

The same must occur with Forest MIS species and data on the current status of local and regional populations must be fully provided, A current baseline analysis and mapping of areas of occupied vs. unoccupied habitat for all species of concern, and particular assessment of species needs for <u>increased</u> mature or old growth forest and/or native shrub cover must be provided. How fragmented is the existing habitat at present, and how much will this project increase that fragmentation? Only then can a reasonable range of alternatives be developed – and in fact, after the FS conducts the necessary nesting inventories for sensitive species and migratory birds and native raptor surveys and native carnivore surveys, it may determine that a drastic <u>increase in forested and mature native shrub cover</u> is what is actually needed.

We Object to the following EA deficiencies: Where are all mature and old growth forested and shrub communities in this landscape? What are these specific community types? Please provide detailed mapping. Where are all old mature and growth trees and stands? How is this defined? How much old growth and mature stands of woody vegetation and the habitat it provide will remain in the project area following these radically disturbing and often overlapping “treatments”?

We have observed time and time again where new fires rip through previously logged and/or burned areas. Please review all recent fires in this region and adjacent BLM lands, and determine where such burns have taken place, and/or burns of logged, thinned, treated, or otherwise disturbed areas. We Object to any hard probing look at past fire circumstances.

This Marine Warfare EA is the dead opposite direction the Forest should be going. The FS should be striving to protect existing forests from loss to address and ameliorate the climate crisis – rather than purposefully destroying those that remain - a form of planetary suicide. Past tree cutting/logging/treatments and weed-causing livestock

grazing have greatly contributed to fire across the landscape. The FS must take action to greatly reduce and/or remove disturbances to buffer lands from fire impacts - rather than proposing intensified grazing. We Object to the lack of a suitable range of alternatives to do so.

What is the current grazing situation here and in surrounding lands? Have livestock been removed? Please specify. Now it appears this EA would either bring back grazing and/or increase grazing (if they haven't been removed).

We Object to the EA failure to take a hard look at evidence (and common sense observations) that climate stress and megadrought make "recovering from aggressive scorched earth agency "treatment" disturbance much more difficult than in the past, and grazing works synergistically to make it all worse – due to climate stress and hot temperature extremes. See Fusco et al. 2019, Kerns et al. 2020. Across Region 4, the FS is trying to undertaking massive habitat destruction projects – which, if achieved will result in millions upon millions of deforested, hotter, drier, windier weedier more fire prone areas. For example, in Utah Forest, in Idaho Forest - with the Salmon-Challis Forest slated for millions of acres of burns and "treatments", the Boise Forest busily destroying any mature trees amid a sea of heavily logged lands, a Forest-wide sawtooth radical prescribed burning project across 1.2 million areas, similar to a cookie cutter 100,000 acres annually burning proposal recently scoped by the Humboldt-Toiyabe. This means the FS could readily swoop back into the project area and surrounding lands after the ROD is signed for the EA< and issue minimal CXs ot burn the higher elevation and other areas not included in the EA "units". We Object to the failure to fully address the welter of foreseeable treatments and threats to species, watersheds and biodiversity.

We Object to the Bridgeport RD failing to take a very long and hard look at its ecologically destructive grazing program where almost no allotments have undergone any modern day and/or current NEPA analysis - including a consideration of climate change stresses and whether continued grazing under such circumstances can be considered "sustainable". on these lands. See also Belsky and Gelbard 2000, Reisner et al. 2013, Williamson et al. 2020 describing how grazing increases flammable invasive species. We object to the lack of a hard look analysis of how each one and all combined treatment disturbances in each type of vegetation community singly and as a whole, will increase harms and stresses from climate change, and will harm the ability of the Forest Service lands to buffer climate change as hotter temperatures and more violent weather extremes expand amid the western mega-drought. It is irrational, arbitrary and capricious, to propose a massive purge of native vegetation and increase the livestock grazing burden on these lands and fragile watersheds and native pant communities– at the same time they are under a huge battery of stresses, purposefully destroy and fragment wildlife habitats to spend millions of dollars on making hotter, drier, winder, weedier, more fire prone sites.

We Object to the lack of a detailed current ecological grazing analysis process. See Fleischner 1994, Belsky et al. 1999 riparian paper, Belsky and Gelbard 2000, Connelly et al. 2004, Beschta et al. 2012 and 2014. A full analysis of ecological conditions as currently affected by the livestock grazing burden on these lands, and of grazing of capability, suitability, grazing conflicts, grazing weed spread, competition with wildlife for food/cover/space, effects on all species of conservation concern including rare plants, aquatic and riparian species and migratory birds must take place. How and where are livestock are damaging soils, protective microbiotic soil crusts (fix carbon, prevent erosion in wind and water, help prevent irreversible flammable cheatgrass), water quality (hotter temperature from grazing stripping riparian vegetation, preventing willow/alder/cottonwood growth and altering potential of wetted areas and floodplains – see Belsky et al. riparian paper 1999, hotter temperatures from treatments within and adjacent to – including on sideslopes riparian areas that reduce and destroy cooling shade and moderate micro-site conditions as well as allow livestock readier access to waters and riparian zones;) - and now the EA's contemplated treatments with adverse effects amplified by climate change stress (Catlin et al. 2011, *Livestock grazing management in the face of climate change*, Beschta et al. 2012 *Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates,* and 2014) – and similarly shade loss, sedimentation and cobble embeddedness increases with adverse effects on aquatic biota, algae including potential toxic algae from the combination of heat and livestock pollution (manure, urine, dead livestock) in and near waters, etc.) and reductions in flows and water quantity. We Object to the lack of site-specific data and analysis. For example, where are headcuts in impacted springs/meadows/streams and stream tribs? Is the drainage network stable or unraveling – especially given the highly erodible granitic soils across much of the project area? How much have streams become entrenched? Will the combined effects of deforestation + "regular" permitted livestock grazing + hordes of additional livestock (goats, sheep, cows, horses) grazed repetitively in unknown places in an unknown ways and with no specified trampling standards and very high watershed-destablizing herbaceous use levels in upland and riparian areas - and turned out anticipating basically a scorched earth style intensity of impacts taking place,? How much grazing-attributable degradation and flow loss is there/ What are underlying trends in flows and perennial vs. intermittent vs. ephemeral stream lengths?), watershed health and integrity and processes - including the watershed's ability to cope with weather extremes under climate stress, ecological condition of habitats for aquatic and territorial species, cultural sites, etc. must be established as a baseline for understanding where any "treatment" of livestock-impacted and often highly damaged sites/watershed/habitats may be appropriate, and where lands have the ability to recover under climate stress and on top of the current levels of grazing/road/logging/treatment disturbances. The condition of lands prior to any treatment or burn affects the condition of lands following a project. Very long periods of rest are needed for recovery of arid western watersheds. We Object to the lack of systematic science-based current baseline data and hard look analysis of all of these grazing concerns (with both permitted and unknown amount of additional scorched earth grazing) concerns and the laundry list of possible actions in EA Tables that makes any

coherent NEPA "hard look" at what exactly will take place at each site in the context of each site's unique characteristics impossible (i.e.slope, veg type, successional state, stand structure, aspect, existing weed presence, etc.).

This is made even worse as the FS is trying to ram this through under a mere EA and FONSI claiming "no significant impacts". Yet clearly for a project inflicting so much disturbance at so many levels - with each type of disturbance having a high weed infestation aftermath and increased wildfire risk, and with so many actions resulting in hotter/drier/winder/weedier sites that make lands more fire prone and less resilient in the face of disturbance – all while in denial of the current stress climate change and the megadrought are causing and the characteristics of climate-driven fires. Any Forest Official signing a FONSI will be knowingly misleading the public on matters of grave consequence -involving potentially permanent losses of sensitive species habitats, increased fire risk and danger, degradation and loss of sensitive species and ESA-listed species habitats, and a host of other minimally addressed serious issues. The bottom line is that the Marines two million dollars have bought the fast-track minimal analysis and blind one-sided alternative, failure to consider a broad range of science and NEW scientific and observational information and research findings - despite the project's risk.

We Object to the EA's LACK of a current valid baseline livestock grazing capability analysis (with current site-specific data on vegetation production, effects on soils erosion and stability including many of accelerated erosion of highly erodible already greatly livestock-damaged granitic soils, site accessibility to livestock, terrain, steep terrain, the combination of factors restricting livestock use, etc.). We Object to a lack a modern day science-based grazing suitability analysis to determine if the regular permitted level of livestock grazing really is suitable in lands undergoing unprecedented climate stress, the megadrought, and where livestock are known to INCREASE and expand flammable cheatgrass and other invasive weeds as well as substantially degrade habitats for native biota, in these fragile Sierra sites. This all is necessary to just assess the basic livestock impacts and the relative degree of impacts and manner of grazing at present, - and in order to understand HOW "regular" permitted grazing use will be changed, shifted, altered and intensified in previously less grazed sites after woody vegetation is cleared off. Capability is the potential of an area of land to produce resources and supply goods and services (FSM 1905; 36 CFR: 219.3). We Object to the EA failing to provide adequate current baseline data to scientifically understand current capability. How will invasion of cheatgrass affect capability? Where is tree canopy reducing forage production to less than 200 pounds per acre? What is the current actual "forage" production now?

We Object to the FS preparing an EA and draft FONSI when major levels of risky veg/highly erodible soils/crust/water/watershed/sensitive and ESA-listed species habitat/recreational use disturbance and certain large-scale habitat damage would be applied. These MAJOR and overlapping disturbances include:

Hand Thinning. Hand thinning includes use of chainsaws to hand cut and pile material. This material would then be burned in piles or chipped using a wheeled/tracked chipper.
Thinning Specifications:

- • _Manually cut conifers up to 14-inch diameter at breast height.
- • _Manually cut brush species.
- • _Cut all brush and ladder fuels from underneath the drip line of trees that will not be removed.
- • _Cut hazard trees that pose an immediate danger to people working on the ground or that threaten life and property.
- • _Three downed logs per acre will be retained. [And the rest will go up in pile burn smoke???].
-

[Several of these disturbances run a high risk of injuring and harming and/or killing adjacent vegetation, and especially in the case of conifers – a high risk of causing insect infestations that then move out and destroy thousands (or tens of thousands of additional acreage- and of course a high risk of irreversible cheatgrass and flammable weed infestation and spread – and without site-scientific detailed analysis of the current conditions in a species area and baseline studies, effects can not be understood – the flimsy programmatic EA greatly fails to do so. Each specific site must also be considered in the context of what existing surrounding slope/aspect/elevation/past disturbance/vegetation communities/habitat and species of concern/soil/water/watershed conditions are species habitat actually is).

It is impossible to properly assess indirect and cumulative effects to species habitats under NEPA unless the FS specifically describes **with certainty** what actions will actually be taking place in each site with far greater detail (soil erosion vulnerability, amount of current cheatgrass, health as influenced by livestock grazing impacts, etc.). Instead, the EA merely has lists of actions some of which may or may not be applied in any particular unit. See Tables 1, "examples" of "potential" treatment actions. Table 2, "design elements". The bottom line is that specific actions within each unit are NOT nailed down so the results will be even more highly uncertain and unpredictable, and a FONSI cannot be honestly signed.

Insect infestation of lodgepole pine along access route where limbs have been cut off some trees. Insects are lured to sap, and then go onto kill limbed trees, and populations build and they put large areas of surrounding lands -especially as climate stress results in conditions more favorable to many forest "pest" species.

We Object to the FS failing to take a hard look at common sense and honestly assess the following concerns: By reducing cooling shade from trees and shrub, and shrubs anchoring plant communities – these actions would make sites more accessible to livestock disturbance thus increasing cheatgrass and flammable weed risk, as well as hotter, drier, windier and weedier as a result. The FS is elevating fire risk and danger, as it simplifies, alters, destroys and fragments mature woody vegetation communities relied upon by nearly all the sensitive and important species and migratory birds in this landscape. The project will injure, damage and kill trees resulting in copious sap attracting insect "pests" and making any "forest health" problems worse - including all the areas outside the Treatment units and surrounding landscape. The end result will be much greater loss of live forest canopy cover than is associated with trees "treated". How

much mortality of adjacent or remaining unthinned trees is likely to occur? See photo of copious tree sap along Marine War area access route where limbs have been cut off some trees and bulldozing/road grading has killed and injured some smaller trees generating sap.

Note sapsucker drill holes. We use this to illustrate that "forest health" justifications are no reason for the FS to go in chop up or burn trees when they are providing wildlife habitat benefit.

Mechanical Equipment. Use of mechanical equipment for treatment includes mechanical mastication of brush and small trees and commercial fuelwood operations. This may require and include yarding/skidding material short distances in some cases. Yarding/skidding consists of a system that uses cables/winches to transport material out of wooded areas. A masticator walks on top of surface fuels as it shreds live vegetation and woody debris. Typically, masticators have a ground pressure of less than 6 pounds per square inch depending on the type of machine being used.

Mastication Specifications:

- Masticate conifers up to 14-inch diameter at breast height. [This would differentially remove more mature trees of some species vs. others – such as incense cedar].
- Masticate 'brush" species. [This illustrates the FS's attitude toward complex native vegetation communities – "brush" that provides crucial nesting habitat for many migratory bird species including Brewer's Sparrows, Green-tailed Towhees, and many other migratory bird species of concern, and the FS has not taken a hard look at the significant population declines and losses of habitats these species have already suffered. This is made even worse by the FS planning in its scorched earth grazing to allow livestock to eat 20% of any shrubs, that may remain or be trying to recover - including any that may be recovering as they strip the understory].

- Masticate treatment-created slash and existing dead and downed surface fuels
- Masticate on slopes less than 35%.

{Mastication runs a high risk of injuring and harming and/or killing adjacent vegetation, and especially in the case of conifers – a high risk of causing insect infestations that then move out and destroy thousands (or tens of thousands of additional acreage- and of course a high risk of irreversible cheatgrass and flammable weed infestation and spread – and without site-scientific detailed analysis of the current conditions in a species area and baseline studies, effects cannot be understood – the flimsy programmatic EA greatly fails to do so, and we Object to this. Each specific site must also be considered in the context of what existing surrounding slope/aspect/elevation/past disturbance/vegetation communities/habitat and species of concern/soil/water/watershed conditions are species habitat actually is.

It is impossible to properly assess indirect and cumulative effects to species habitats under NEPA unless the FS specifically describes what actions will actually be taking place in each site with far greater detail (soil erosion vulnerability, amount of current cheatgrass, health as influenced by livestock grazing impacts, proximity to roads and thus highly foreseeable crosscountry travel increases and potential for catalytic converter human-caused fires, etc.).

Insect infestation of lodgepole pine or other forest conifers along access routes where limbs have been cut off some trees. Insects are lured to sap, and then go onto kill limbed trees, and populations build and they put large areas of surrounding lands -especially as climate stress results in conditions more favorable to many forest "pest" species. Mastication and cutting both will injure surrounding trees and result in heaps of soil-surface smothering dry wood chips that will lure in insect infestations to surrounding healthy trees – so the magnitude of damage done to mature and old growth habitats will be even greater ,and also highly unpredictable as the extent of such infestations cannot be predicted.

By reducing cooling shade from trees and shrub, and shrubs anchoring plant communities (many shrubs will be killed as collateral damage from mastication machines)– these actions would make sites more accessible to livestock disturbance thus increasing cheatgrass and flammable weed risk, as well as hotter, drier, windier and weedier as a result. The FS is elevating fire risk and danger, as it simplifies, alters, destroys and fragments mature woody vegetation communities relied upon by nearly all the sensitive and important species and migratory birds in this landscape

Operation of heavy equipment crosscountry will churn and displace soils and foster erosion and exposure of cultural materials and sites].

<u>Prescribed fire.</u> The purpose of prescribed burning treatments is to restore fire to the ecosystem, reduce dead and downed fuels and vegetation, and dispose of accumulated hazardous fuels throughout the project area. Various methods of prescribed burning include hand pile, jackpot, understory, and broadcast burning, as described below.

➢ ♉***Hand pile burning*** describes one or more hand piles burned collectively across a unit.

➢ ♉***Jackpot burning*** is where irregularly shaped jackpots of fuels, such as from lop and scatter, are ignited, resulting in a mosaic pattern.

➢ ♉***Understory burning*** is fire that is ignited under a forested canopy which typically results in a mosaic pattern of low to moderate intensity.

➢ ♉***Broadcast burning*** is a more general term to describe burning that is applied over all or the majority of an area yielding varying fire intensities. Broadcast burning, for this project, is used to describe burning that would occur in primarily brush fields where the purpose is to have fire burn the upper canopy as well as dead and downed surface fuels.

Prescribed Burning Specifications:

• • _Burn hand piles in designated areas to reduce activity and existing surface fuels. Hand piles would be chunked enough so that at least 90% of the pile is consumed.

• • _*Utilize a combination of broadcast, understory, and jackpot burning in areas where more continuous fuels exist. It may be necessary in some places to burn two or more consecutive years to reach desired conditions, to control understory vegetation, and/or to reduce subsequent fuels buildup from fire-induced mortality.* ○ *Results in a mosaic pattern* [a mosaic = habitat fragmentation] throughout a small portion of the unit, creates snag patches and small concentrations of downed woody debris. But the FS Plans to clean up all the woody debris, too]..

Grazing.

Livestock may be used during the late winter, spring, and fall months. Fine fuels would be targeted for grazing. Occurrences of invasive or noxious grasses such as but not limited to cheatgrass (*Bromus tectorum*) and medusahead (*Elymus caput-medusae*) may be targeted for gazing to reduce fuel loading and seed head production.

• _Livestock would be excluded from any areas recently planted or seeded and any other designated exclusion areas, such as archeological sites.

• _Livestock may not graze all acres of the project area in any one season but would be utilized where dense areas of fine fuels exist.

• _To avoid damage to desirable perennial plants, consumption would be monitored, and the livestock would be removed when utilization of fine fuels is at 80%.

• _Browsing of mature shrubs would be limited to 25% utilization in non-bedding or watering sites.

•

• [ALL of these forms of burning - will unnecessarily release carbon into the atmosphere. Burning is highly likely to result in expanded cheatgrass infestation and spread, risk of fire escape, simplification of woody vegetation communities, expanded livestock access to remnant ungrazed sites by removing underbrush, extensive new soils erosion on highly erodible unstable granitic soils also grazed and disturbed by livestock, increased sedimentation into ephemeral/intermittent/perennial streams and aquatic species habitat impairing water quality and harming native biota through smothering egg masses/redds/ and substrates.

•

Here's how 2021 Bridgeport RD pile burning scalds soils and creates ideal sites for weed infestation and spread, and we Object to the FS deceiving the public about the harms its actions may cause]. That is especially the case when the abusive, minimally controlled current domestic sheep grazing currently taking place runs sheep tight through and across the burned, scalded soils- causing even more soil erosion and instability. Further, existing livestock grazing adversely affects seeps, streams and springs and drainage networks reducing the capacity to handle accelerated runoff and discharge

Dark soil surface from burning increases site heating and drying.
Burning reduces soil protection and harms and destroys protective microbiotic crusts.

The FS burned years old poles of wood, some of it already rotting. This very predictably burned extremely hot, and scalded soils.

Grazing

*Grazing treatment involves the use of livestock for fine fuels reduction and maintenance of imple*mented treatments.

Grazing for Fine Fuels Specifications:

Grazing Maintenance Specifications:

• • _Livestock may be utilized during any season to maintain previous implemented treatments.

• • _B_r_u_s_h_ _a_n_d_ _f_i_n_e_ _f_u_e_l_s_ _w_o_u_l_d_ _b_e_ _t_a_r_g_e_t_e_d_ _b_y_ _l_i_v_e_s_t_o_c_k_ _t_o_ _m_a_i_n_t_a_i_n_ _e_x_i_s_t_i_n_g_ _f_u_e_l_ _b_r_e_a_k_s_._ _[This is greatly harmful to declining migratory birds and other wildlife, and will result in "take".

• • _Temporary fencing for targeted grazing of implemented projects may be necessary to focus livestock to create a more uniform impact on targeted plants. Fencing of areas may be 1-5 acres in size. [This will shift and intensify impacts creating a large number of new weed zones, eroding bare areas threatening aquatic species habitats during runoff, and the fencing itself will harm and displace/cut off wildlife.

With the EXISTING permitted grazing, FIM sheep are already significantly harming and destroying regenerating Aspen, riparian area, sagebrush communities and forest understories

across this landscape. This includes uniformly trampling and disturbing soils and protective crusts,, stripping protective watershed cover, devouring young aspen ramets, suckers, and degrading and polluting riparian areas. They are also devouring native shrubs, spreading cheatgrass /weeds, and causing new cheatgrass/weed expansion.

Photos below show existing Aspen impacts – To the vegetation community, to soil stability, to exposure of highly erodible soils and trampling-caused impacts..

Sheep-destroyed sagebrush at Bedding site right by/on small stream.

This trampled mangled mess actually has grossly sheep-trampled and fouled small riparian area in its middle.

We Object to the FS failing to provide the public with a realistic, current and honest assessment of current permitted grazing impacts, failure to provide monitoring information for the past decade including lentic monitoring, failure to even reveal existing standards and their adequacy/inadequacy, failure to examine permittee compliance, failure to examine grazing impacts in the context of making climate and drought stresses worse for all affected resources.

The photos and site conditions illustrate typical sheep disturbance to granitic soils, riparian areas, native veg communities and sensitive species habitats from current permitted FIM grazing. We Object to the lack of a candid baseline of these chronic livestock impacts, thje lack of any effective sheep weed dispersal controls, and stress that this trampling and stripping of vegetation was taking place during migratory bird nesting season/wildlife birthing season, etc. stripping protective cover and destroying food sources for native animals, as well as increasing predation risk and spreading potential disease. We Object to any science-based honest assessment of such impacts on all values, as well as site recovery ability post-"treatment".

It is apparent that **an EIS must be prepared** to address this mass of overlapping highly damaging aggressive treatments to be conducted with no hard look site-specific assessment at the

full battery of stresses on and threats to the native biota and watersheds across the project area. We Object to this and to the host of EA shortcomings and the nearly non-existent baseline information provided in the EA – where no draft EA was issued for public comment – thus the public could not have anticipated how extraordinarily lacking in site-specific baseline information and analysis for fire science, climate change and climate change stresses, invasive species risks. Wildlife and sensitive species habitats and populations, watersheds, native plant communities, forestry values, recreational uses and enjoyment, cultural values, unique sites (such as old growth incense cedar groves) and a host of other values. this draft final EA and draft FONSI would actually be. For example, the specific sites to be treated, their unique and individual characteristics such as slope, aspect, per cent weeds already present, the amount of sheep grazing degradation, importance to wildlife, etc. and the specific set of radical disturbance actions to take place in each site targeted for treatment have not been provided. There are many unique and varying conditions and ecological circumstances with each area. The EA is a cursory near-boilerplate document clearly designed to reach a fore-ordained conclusion. It fails to address a host of countervailing scientific studies and the continually emerging information on climate change stress and the conditions under which wildfire burns in this unprecedented area of global warming, megadrought, aridification, and heat domes.
Thus, a reasonable person can only conclude that this battery of over overlapping and/or repeated land and habitat-devastating treatments impacts will be highly significant in scope, intensity and magnitude.

This is a highly diverse and complex landscape with a sweeping elevation range and a host of native biodiverse woody vegetation communities relied upon by many hundreds of species as food, cover, shelter, nesting/birthing, migration use, year round use and for other purposes. 18,000+ acres amid 60,000 acres are to be radically altered – greatly fragmenting habitats and disturbing watersheds.

This destruction of woody screening and protective vegetation will also make all of the Marine disturbance activities more visible to, and intrusive on, human disturbance sensitive wildlife species. How much will burning or severely grazing sagebrush increase big game exposure to human disturbance" How much will cutting forests increase big game exposure to human disturbance in all seasonal habitat types, and where are these habitat types located? Where are all fawning areas for big game? Where are all bi-state Sage-grouse habitats in and surrounding the project area – and how are they affected by vegetation treatments including deforestation that fosters cheatgrass infestation and more frequent fires? How are they impacted by incessant livestock grazing disturbance? When and how is livestock grazing affecting Sage-grouse, migratory bird, and other native wildlife species use of habitats and the ecological conditions of habitats across this local and regional area? We Object to the failure to take a hard look at these significant issues in the EA.

We have observed Dusky Grouse in the project area. This project could seriously harm this species that relies upon conifer needles all winter long as winter food. What is the status of this population, and what is the estimated number of birds and the available habitat in the local and regional area/?

What is the status of the Mountain Quail population here? This project will destroy the dense mountain shrub cover required by Mountain Quail. See: https://www.monocounty.org/things-to-do/sightseeing/bird-watching/

This area looks loke very good Gray Wolf habitat. There is a Wolf Creek on the land status map right in this area - very likely indicative of historic Gray Wolf site occupation. As you may be aware, Wolves are being mercilessly persecuted across much of their range since de-listing. However, the Gray Wolf in California is protected by the state – and this project greatly threatens highly foreseeable Gray Wolf occupancy of habitats by radically disturbing, degrading, fragmenting and clearing big game and other Wolf prey species habitats, as well as by the projects extreme "manicuring" cutting down, piling wood, scorched earth pile burning, running sheep/cows/goats/??? over and across the "treated' sites that became infested with weeds due to the severe overlapping treatment disturbance, and the added stress of climate change hindering recovery from the FS aggressive treatments. Of vegetation and understories plus even MORE habitat-destroying livestock under the guise of "fuels" grazing after the FS generates vast expanses of flammable invasive grasses. Has there been an assessment done of potential gray Wolf habitat in this area? This must be undertaken as part of this process – in the necessary EIS. We Object to the lack of an adequate hard look analysis at impacts to Gray Wolf.

This landscape is also complex because of the multiple management entities at play. USFS, Marine, State Game Dept, BLM. There are degraded state-managed Game Dept. lands inadequately addressed and the full range of activities there- including the harmful footprint of domestic sheep or other grazing in degrading watersheds shard with the FS - is not adequately examined. WLD observations have led us to believe that the sheep grazing has only served to intensify weed problems. This map shows the location of some of the CA Game Dept, lands in the project area and watersheds.

https://wildlife.ca.gov/Lands/Places-to-Visit/Pickel-Meadow-WA/lc/386696/lcv/s and https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=87856&inline

The project area and landscape is being severely degraded by livestock. See photos, and Fite e-mail to Acting Ranger Leao with photos of mainstem of the West Walker river shows extensive degradation there, too and some project-impacted streams are tributaries to this river. This extreme degradation appears to extend onto USFS land. Also, see photos below.

We Object to the EA's failure to take a hard look at the chronic Marine disturbance – both on the ground and in the air (with loud noise startling and displacing wildlife) as well as all manner of maneuvers startling and displacing wildlife) must be critically assessed. Wildlife are subjected to loud frightening helicopters and other Marine activity with a disturbance footprint across this landscape in all seasons of the year. No hard look

is taken at the baseline noise footprint, at disturbance footprint -including fire-risky activities such as use of V-22 hot exhaust helicopter plane hybrids. Moreover, we are concerned that night-time activity may use pyrotechnics or other devices. The full footprint of Marine training disturbance to all wildlife species of concern here has not been assessed. We also note that the Marines only directly control small acres around various helicopter landing sites and a few other facilities, and are in control of all the rest of the affected lands. An EIS should have been prepared with alternatives focused on fire problems around those sites and facilities – rather than destroying the backcountry for the Marines after they threw 2 million dollars at the project.

A full hard look at all direct, indirect and cumulative effects of the marine land and any air overflight activity including noise and use of any night illumination or other activity must be fully provided.

It appears there is a gradual takeover of this land by the Marines, and a full integrated analysis of the harmful impacts of all of the "training' disturbance on top of this massive habitat destruction and deforestation project that will make the USFS lands hotter drier, windier, weedier and more likely to burn must be undertaken in an EIS. See for example, Bradley et al. 2016.

There is also BLM land in the vicinity, crucial watersheds, ESA-listed species, and numerous sensitive species including bi-state sage-grouse. Yet a reader of this minimal EA has no idea what animals are currently found in specific project sites, the general number of animals and rare plants present in the project area and within the treatment units. what specific projects will take place – and how many acres- in the species habitats, what the scale and condition of habitats across the project area and in the local and regional area. nor of the populations at the local and regional level that are affected, either. ALL of these species are at heightened risk of 1) Direct habitat loss form the project; Indirect and cumulative losses as habitats surrounding become fragmented; collateral damage from use of highly aggressive burning and mastication machines, as only the most general of idealized vegetation community types are shown on a mal that greatly lacks detail necessary to understand the complexity and condition of veg communities/habitats and watersheds. We object to the EA failure to take a hard look at these effects.

The FS's planned radical fire destruction of forests by mechanical and fire use (underburn, jackpot burn, prescribed burn, pile burn, hand thinning, slashing, mastication, herbiciding, etc.) are unnatural in many ways – from soil scalding wed-causing severe pile and jackpot burn impacts. They represent a tremendous amount of often overlapping/additive/cumulative habitat loss and fragmentation. For

Full and detailed inventories for sensitive species and migratory birds across this region (and the Bridgeport RD and adjacent BLM lands must take place and be fully integrated

into an EIS for this project-given the high degree of risk and uncertainty and the complex and biodiverse existing landscape and rare species at stake. We Object to the lack of a critical hard look analysis.

This action will spawn immense weed increases and is highly likely to be linked to large-scale use of toxic chemical herbicides with significant adverse impacts to sensitive species and watersheds. The Marines on the field trip stated they can't use chemicals - but they only outright control a few hundred acres, and the FS controls the rest.
We incorporate by reference into this marine War EA WLD's comments in herbicide use Sawtooth and Boise Forest Vegetation (Weed/Herbicide use) EIS) into these current comments on this HT Marine War Game Range forest project – and stress that the HT Forest has NO current valid herbicide analysis , and appears to never have done one in recent decades to our knowledge. It is extremely likely that many kinds of toxic chemicals will be used in significant amounts in the aftermath of these wide-scale scorched earth treatments and grazing. The FS cannot sweep serious ecological concerns under the rug and refused to consider effects. Now we are faced with a proposal for rampant treatment and fire disturbance and intensive and severe grazing of wild lands – and the FS scoping document contains no baseline data and information on the current ecological c0ondtions of habitats critical to a host of native biota.

Forests across the region are being proposed for such purposeful destruction that will have a drastic regional impact to migratory birds, sensitive species, ESA-listed species and federal candidate species etc. This all is taking place at the same time, on top of large-scale wildfire losses.

These massive disturbance projects will only make lands be hotter, drier, weedier, windier and they will dry out sooner resulting in a longer fire season.

There is very limited info on sensitive species and migratory bird habitats and populations, areas of species occurrence, habitat quality and habitat quantity for sensitive and important biota and viability of populations - and many other values impacted, harmed and likely to be destroyed by this forest destruction –especially in relation to the treatment units .

The FS must take necessary actions to conserve, enhance and restore Mountain Quail, Northern Goshawk, Flammulated Owl, native carnivores, native pollinators and other sensitive species and plummeting populations of migratory birds. See Rosenberg et al. 2019. Regrettably, this proposal will cause accelerated degradation and destruction of habitat, and woefully forsakes agency promises of actual habitat restoration. See Williamson et al. 2019/2020, Rosenberg et al. 2019, Fusco et al. 2019, Kerns et al. 2020.

On areas inhabited by many of these species in this larger landscape, huge areas are threatened by BLM and other USFS massive destructive and habitat fragmenting Fuelbreaks and so-called "Restoration" EIS proposals. This Marine War project will deal

a further blow to sensitive species and migratory bird species, through its outright habitat destruction and its disturbance priming sites for irreversible flammable cheatgrass and other weed infestation. Just like this project, these huge BLM treatment disturbances will also create hotter, drier more fire prone conditions and worsen the fire risk while destroying and fragmenting species habitats and watersheds. See Fuelbreaks: https://www.federalregister.gov/documents/2019/06/21/2019-13021/notice-ofavailability-of-the-draft-programmatic-environmental-impact-statement-for-fuelbreaks-in
"Restoration": https://eplanning.blm.gov/eplanning-ui/project/122968/510

The BLM's "Restoration" EIS involves radical destruction of low elevation forest, mountain shrub and sagebrush communities across 38 million acres. There have been numerous news reports that Sage-grouse populations across the region are also in decline. There is no freeboard or room for error in habitat management actions if this species is to survive – yet FS and BLM proposals to tear up habitat -or risk "escaped" prescribed fires – abound. See Connelly et al. 2019.
https://www.researchgate.net/publication/337818762_CONSERVATION_NEWS_Sage-Grouse_Population_Declines_Species_in_Crisis_and_Agencies_in_Denial

The BLM "Restoration" EIS will also drastically disturb, alter and fragment both sagebrush and low elevation forested habitats across 38 million acres of public lands – dealing a colossal blow to many migratory birds, sensitive species, and watersheds shared with FS lands. We Object tot ehfailure of the EA to take a hard look at the significant threats such immense expanded traetemnts pose to the same species 9lme Brewer's Sparrow that nests innice thick dense sagebrush – the knid the agency vegetation community modelers love to hate.)

Recent reports on the world-wide biodiversity crisis and huge declines in avian species across North America, global declines in biodiversity, the imperilment of large numbers of species, declines in even "common" species and other dire ecological information highlight the need for great changes in management of these very important public lands - not torching them with a massive series of often overlapping mechanical, fire and scorched earth livestock grazing "treatments".

Lands will be greatly vulnerable to being overrun with weeds and exotic species from this FS disturbance.

The Marine War treatments will cause cheatgrass, medusahead, rush skeletonweed, knapweeds, bulbous bluegrass, intermediate wheatgrass, smooth brome and a host of harmful habitat-destroying exotics to INCREASE. This will be made worse by even greater livestock grazing impacts. How many acres does each of these species currently occupy? Where? Please provide mapping and detailed analysis. How much will each of these species expand? The treatments will worsen the biodiversity crisis. See: https://www.theguardian.com/commentisfree/2019/may/06/biodiversityclimate-

change-mass-extinctions
Despite the profound threat of biodiversity loss, it is climate change that has long been considered the most pressing environmental concern. That changed this week in Paris, when representatives from 130 nations approved the most comprehensive assessment of global biodiversity ever undertaken. The report, spearheaded by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), found that nature is being eroded at rates unprecedented in human history. One million species are currently threatened with extinction and we are undermining the entire natural infrastructure on which our modern world depends.
https://www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services
https://www.ipbes.net/system/tdf/ipbes_7_10_add.1_en_1.pdf?file=1&type=node&id=35329
See: Report of the Plenary of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services on the work of its seventh session

https://cornellsun.com/2019/09/26/ornithologists-birdwatchers-uncoverstaggering-magnitude-of-bird-population-decline/
2.9 billion birds gone in 50 years.
"Seeing this net loss of three million [BILLION] birds was shocking," Rosenberg said".
https://www.audubon.org/news/north-america-has-lost-more-1-4-birds-last-50-years-new-study-says
North America is home to nearly three billion fewer birds today compared to 1970—that's more than 1 in 4 birds that have disappeared from the landscape in a mere half a century.
"This was an astounding result, even to us," says lead author and Cornell Lab of Ornithology conservation scientist Ken Rosenberg.
https://science.sciencemag.org/content/early/2019/09/25/science.aaw1313
Decline of the North American avifauna, Rosenberg et al. 2019. Abstract:

Species extinctions have defined the global biodiversity crisis, but extinction begins with loss in abundance of individuals that can result in compositional and functional changes of ecosystems. Using multiple and independent monitoring networks, we report population losses across much of the North American avifauna over 48 years, including once common species and from most biomes. Integration of range-wide population trajectories and size estimates indicates a net loss approaching 3 billion birds, or 29% of 1970 abundance. A continent-wide weather radar network also reveals a similarly steep decline in biomass passage of migrating birds over a recent 10-year period. This loss of bird abundance signals an urgent need to address threats to avert future avifaunal collapse and associated loss of ecosystem integrity, function and services.

A new USGS Report documents dramatic declines in Sage-grouse populations – with an 80% population decline since 1965.

https://www.usgs.gov/news/new-research-highlights-decline-greater-sage-grouse-american-west-provides-roadmap-aid?qt-news_science_products=1#qt-news_science_products

https://pubs.er.usgs.gov/publication/ofr20201154

Please provide data on all Toiyabe FS and adjacent BLM Sage-grouse habitat, and changes in leks, bird numbers, and habitat for all time periods for which records have been kept.

During roughly the same time as Sage-grouse have suffered an 80-% drop, Cornell records show the Pinyon Jay has declined by 85%. See also new Boone et al. 2021 paper on Pinyon Jay habitat use across elevations.

https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0237621

Abstract. The Pinyon Jay is a highly social, year-round inhabitant of pinyon-juniper and other coniferous woodlands in the western United States. Range-wide, Pinyon Jays have declined ~ 3–4% per year for at least the last half-century. Occurrence patterns and habitat use of Pinyon Jays have not been well characterized across much of the species' range, and obtaining this information is necessary for better understanding the causes of ongoing declines and determining useful conservation strategies. Additionally, it is important to better understand if and how targeted removal of pinyon-juniper woodland, a common and widespread vegetation management practice, affects Pinyon Jays. The goal of this study was to identify the characteristics of areas used by Pinyon Jays for several critical life history components in the Great Basin, which is home to nearly half of the species' global population, and to thereby facilitate the inclusion of Pinyon Jay conservation measures in the design of vegetation management projects. To accomplish this, we studied Pinyon Jays in three widely separated study areas using radio telemetry and direct observation and measured key attributes of their locations and a separate set of randomly-selected control sites using the U. S. Forest Service's Forest Inventory Analysis protocol. Data visualizations, principle components analysis, and logistic regressions of the resulting data indicated that Pinyon Jays used a distinct subset of available pinyon-juniper woodland habitat, and further suggested that Pinyon Jays used different but overlapping habitats for seed caching, foraging, and nesting. Caching was concentrated in low-elevation, relatively flat areas with low tree cover; foraging occurred at slightly higher elevations with generally moderate but variable tree cover; and nesting was concentrated in slightly higher areas with high tree and vegetation cover. All three of these Pinyon Jay behavior types were highly concentrated within the lower-elevation band of pinyon-juniper woodland close to the woodland-shrubland ecotone. Woodland removal projects in the Great Basin are often concentrated in these same areas, so it is potentially important to incorporate conservation measures informed by Pinyon Jay occurrence patterns into existing woodland management paradigms, protocols, and practices.

The Object that the FS document fails to clearly reveal how much PJ occurs in the project area – and this sis critical as vast PJ habitats across the West are being destroyed based on similar spurious Landfire and other models. Pinyon pine are mixed in with sage and other species in several areas and are highly likely to be targeted for destruction – both outright and when injured by treatment equipment and insects are lured in that then infest surrounding trees. To the lack of detailed hard look analysis at the full spectrum of treatment impacts.

This project will result in new destruction of pinyon -andzones of depletion of soils, protective microbiotic crusts, mature and old growth vegetation communities, and crucial sensitive species habitat elements - for many bird and animal species that are already suffering precipitous declines – and will thus violate NFMA and result in loss of viable populations of sensitive and MIS species. We Object to the FS failing to squarely assess this. It appears that the FS cares so little about these species that it developed the scoping report and exact same actions in the flawed EA without conducting the essential multi-year site-specific habitat occupancy and habitat condition inventories to determine the relative importance of the habitat to species persistence. Instead, the FS plans to use old and very limited data. That may under-estimate species occurrence and presence.

This project will exacerbate the climate crisis by increasing soil and area temperatures through removal of cooling shade, decreasing soil stability, removing important carbon sinks from the American West, increasing the spread of invasive species, and producing bare soil and resultant dust that accelerates snowmelt, harming sustainable perennial water flows and water supplies. See Williamson et al. 2019, Fusco et al. 2019, Kerns et al. 2020. We Object to the lack of hard look analysis – and this has significant implications for ESA-listed yellow-legged frog, Lahontan Cutthroat Trout and other aquatic biota.

Fire, masticators and other activities associated with this project will destroy protective mosses, lichens and biologicals soil crusts. Undisturbed, late-successional biocrusts have significantly higher rates of carbon sequestration, directly contributing to long-term storage of inorganic carbon beneath the soil surface. Protecting the integrity of biocrusts protects the ability of systems to sequester and store carbon. A synergistic effect is created when surface disturbance occurs on invaded landscapes during drought years, and soil erosion may take place. Increasing temperatures and decreasing precipitation also decrease soil, native vegetation and ecosystem resilience to fire, grazing and other disturbances, exacerbating erosion. The radical treatment disturbance will result in dust that will cause early snowmelt, exacerbating climate stress, and harming sprigs seeps and streams dependent on snowmelt infiltration. Where are all waters across the project area and surrounding lands, and what are current flows and pollution levels? How will flow reductions, sediment, herbicides and other pollution from this radical disturbance impact watersheds? Water quality limited streams downstream? Rare and ESA-listed aquatic species? We Object to the EA's science-based analysis dearth.

The vague, uncertain laundry list of "design elements" provide minimal information and have no underlying basis grounded in a broad range of current ecological science. There is no evidence they will prevent undue degradation of FS resources and species declines and extirpations.

The public is not provided sufficient detail to understand on the ground conditions what specific veg communities are found on the site, nor the current extent of Marine-caused or other weeds and the type of weeds. We Object to this.

We Object to the failure to provide information necessary to understand how the lack of post-treatment screening cover may increase visual and noise intrusions into wild land areas and species habitats, as well as the failure to take a hard look at the road network that may be upgraded or otherwise "improved' in association with the project – resulting in an increased footprint and human disturbance. How will this impact - directly, indirectly and cumulative - adjacent Wilderness areas and the species that inhabit them and whose populations are shared with the project site? Will there be resultant increased roading and/or road footprints/? Where are all current roads and what is their category, size and footprint?

We are also very concerned this area may be soon be occupied Gray Wolf habitat as wolves expand in California and this deforestation scheme will greatly alter protective cover for Wolves and other native predator species and make the lands uninhabitable. See: https://www.oregonlive.com/environment/2021/02/oregon-wolf-tracked-near-yosemite-national-park-the-first-in-the-area-in-100-years.html

By removing such vast areas of habitat – it appears the project seeks to destroy nearly all mature and old growth Forested and mountain shrub communities – although this is determine from the way the information is presented – making the public's ability to effectively comment in scoping very difficult.

The FS uses highly flawed and biased Landfire models to claim lands and fuels are "uncharacteristic" - all assumptions made in all parts of the models used to doom these beautiful native vegetation communities must be fully provided and explained. What scientific studies are the models based on? What fire return and disturbance intervals? One can get pretty much any result one wants by fiddling with the inputs into modeling on Landfire. We also stress that the vegetation-altering schemes of the Forest Plan are old and out-dated and did not take into account the current degree of species declines, forest and other veg community loss, and current science on fire impacts and how wildfires burn (mega-fires driven by weather for example), and many other deficiencies as well. see for example voodoo vegetation modeling described here: https://www.counterpunch.org/2019/12/20/voodoo-vegetation-modeling-dooms-native-forests-and-wildlife-habitat/

We incorporate by reference into these Marine War Deforestation concerns all WLD and other comments on the BLM Categorical Exclusion CX, the BLM "Restoration" EIs and the BLM "Fuelbreaks" EIS (attached and submitted on CD). This highly flawed proposal is based on the same flawed information and radical treatment disturbance biases as plagued ALL of these BLM projects.

There is little information on sensitive species and migratory bird habitats and populations, areas of species occurrence, habitat quality and habitat quantity for sensitive and important biota and viability of populations - and many other values impacted, harmed and likely to be destroyed by this forest destruction and atmosphere pollution scheme.

Here is an example of some of the existing Marine disturbance that must be fully assessed and full range of marine activity modifications must be fully considered: https://www.federalregister.gov/documents/2013/05/21/2013-12155/transfer-of-administrative-jurisdiction-marine-corps-mountain-warfare-training-center-interchange

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd649457.pdf

https://www.29palms.marines.mil/mcmwtc/About/History.aspx

https://govtribe.com/opportunity/federal-contract-opportunity/marine-warfare-training-center-mastication-12026119q0023

Framework ROD

The Sierra NV Framework ROD is now 20 years old.

We Object to the FS failing to provide detailed site-specific information to demonstrate that it has complied with the following ROD requirements:

Spotted Owl.

Northern Goshawk Protected Activity Centers

Stands in each Northern goshawk PAC have (1) one to two tree canopy layers, (2) trees in the dominant and co-dominant crown classes averaging at least 24 inches dbh, (3) at least 70 percent tree canopy cover (including hardwoods), (4) a number of very large (greater than 45 inches dbh) old trees, and (5) higher than average levels of snags and down woody material.

Great Gray Owl Protected Activity Centers

Meadow vegetation in great gray owl PACs support a sufficiently large meadow vole population to provide a food source for great gray owls through the reproductive period.

Willow Flycatcher Habitat

Running water, standing water (pools), or saturated soils are present in the vicinity of willow clumps at least through late June. Meadows have large clumps of riparian shrubs (usually willows) interspersed with open spaces. Average foliar density in the lower 6.5 feet of willow clumps is 50 to 75 percent. At least 50 percent of the foliar density of shrubs is in the lower portions of the shrubs. Duff from the previous season's growth (dead material) is available for nest material. Ground cover is dominated by grasses, rushes and sedges." ROD pps. 9-10.

We Object to the failure of the FS to provide specific information and analysis of the local and regional populations of all species of management concern, and the general location and number of all species of concern within the project area and adjacent lads as well. Are there 10 Northern goshawk pairs in the project area or 50?

"*Riparian Management Areas*

Water quality meets the goals of the Clean Water Act and Safe Drinking Water Act; it is fishable, swimmable, and suitable for drinking after normal treatment.

Habitat supports viable populations of native and desired non-native plant, invertebrate, and vertebrate riparian and aquatic-dependent species. New introductions of invasive species are prevented. Where invasive species are adversely affecting the viability of native species, the appropriate State and Federal wildlife agencies have reduced impacts to native populations.

Species composition and structural diversity of plant and animal communities in riparian areas, wetlands, and meadows provide desired habitat conditions and ecological functions.

The distribution and health of biotic communities in special aquatic habitats (such as springs, seeps, vernal pools, fens, bogs, and marshes) perpetuates their unique functions and biological diversity.

Spatial and temporal connectivity for riparian and aquatic-dependent species within and between watersheds provides physically, chemically and biologically unobstructed movement for their survival, migration and reproduction.

The connections of floodplains, channels, and water tables distribute flood flows and sustain diverse habitats.

Soils with favorable infiltration characteristics and diverse vegetative cover absorb and filter precipitation and sustain favorable conditions of stream flows.

In-stream flows are sufficient to sustain desired conditions of riparian, aquatic, wetland, and meadow habitats and keep sediment regimes as close as possible to those with which aquatic and riparian biota evolved.

The physical structure and condition of stream banks and shorelines minimizes erosion and sustains desired habitat diversity'.

The ecological status of meadow vegetation is late seral (50 percent or more of the relative cover of the herbaceous layer is late seral with high similarity to the potential natural community). A diversity of age classes of hardwood shrubs is present and regeneration is occurring.

Meadows are hydrologically functional. Sites of accelerated erosion, such as gullies and headcuts are stabilized or recovering. Vegetation roots occur throughout the available soil profile. Meadows with perennial and intermittent streams have the following characteristics: (1) stream energy from high flows is dissipated, reducing erosion and improving water quality, (2) streams filter sediment and capture bedload, aiding floodplain development, (3) meadow conditions enhance floodwater retention and groundwater recharge, and (4) root masses stabilize stream banks against cutting action.

We Object to the failure to provide data and analysis of riparian and aquatic habitat conditions – as currently influence by existing treatments, roads, marine activity, and sheep or other grazing, and to properly analyze project treatment impacts. We Object to the failure of the EA to specify and provide detailed mapping and analysis of all riparian areas that will suffer 'treatment". We Object to the FS lack of data and analysis of how much water cooling shade will be lost from each riparian area site to suffer treatment under the project and the effects of grazing stress and climate stress on the time required for any rehab and/or recovery in both riparian and upland habitats in the project watersheds. What is the percent cover and water temperature now in each stream and nearby area to be treated? What will shade and water temperature be anticipated to be post-treatment? We Object to the lack of current data on water quality – temperatures, substrate/cobble embeddedness/sedimentation, bacterial coliform and other sheep/livestock-harbored pathogens (such as caused by current livestock grazing burden) – and now much this burden will change under treatments including even more abusive grazing. We Object to the FS failure to assess how current levels of livestock grazing are impacting riparian areas.

We Object to the failure to provide detailed site-specific analysis of the type and amount and foreseeable location of herbicide use, and foreseeable impacts on soils/waters/animals/people/rare plants, etc. that are foreseeably to be used post-treatment, and that are currently being used in the Bridgeport RD and this landscape.

We Object to the failure of the FS to clearly map and identify, and minimize treatment disturbance impacts on all springs, seeps, meadows and other riparian areas.

The SNF ROD requires:

"*Monitoring and evaluation play a central role in adaptive management and are conducted for three primary purposes: (1) to ensure appropriate implementation of standards and guidelines (implementation monitoring), (2) to track resource conditions and mark trends toward or away from desired conditions (status and change monitoring), and (3) to deal with uncertainties regarding the effectiveness and effects of land management activities (cause and effect monitoring). The latter type of monitoring consists of gathering information to determine whether the effects of various standards and guidelines are consistent with predictions. It is also used to*

validate key assumptions underlying various standards and guidelines, and validate projected outcomes of management. Information gained through monitoring and evaluation will be used to adjust management direction in the future, where warranted, and inform future LRMP amendments and revisions".

We Object to the failure of the EA to establish and adequate baseline for monitoring and adaptive management to take pace., We Object to the lack of specific sideboards and thresholds for action, and the evaluation of any adaptive-management triggered actions effectiveness in the shallow programmatic EA. For example, what actually will be done following significant cheatgrass infestation and expansion from the treatments (witness the cheatgrass behind the Marine Corps buildings where sagebrush bitterbrush and other shrubs were cut off and trees masticated). Livestock grazing will just WORSEN and expand the treatment-caused cheatgrass infestation problem. Moreover, basic information on climate change stress and the added risk it poses on any post-treatment recovery especially in a livestock-grazing disturbed landscape (see Beschta et al. 2012, 2014, and Catlin 2et al. 011current fire and other science is absent.

Forest Carnivore Conservation Assessments – *One goal of this decision is to protect and recover populations of fisher, marten, and Sierra Nevada red fox in the Sierra Nevada …* We stress that Marine winter and year-round activities may impact Sierra Nevada Red Fox habitat.

We strongly Object to the FS removal of complex habitat structure,, including denning sites and foreseeable denning sites for Fishers.

https://www.federalregister.gov/documents/2020/05/15/2020-09153/endangered-and-threatened-wildlife-and-plants-endangered-species-status-for-southern-sierra-nevada

The SSN DPS is found in Mariposa, Madera, Fresno, Tulare, and Kern Counties in California. Historically, the SSN DPS likely extended farther north, but may have contracted due to unregulated trapping, predator-control efforts, habitat loss and fragmentation, or climatic changes. Today the approximate northern boundary is the Tuolumne River in Yosemite National Park (Mariposa County)

The FS should be seeking to expand conditions favorable to Fisher north-ward range expansion to re-occupy former habitat. Instead, the FS is adding new habitat fragmentation. We object to the EA's further fragmentation.

Plant Species Conservation Assessments – This decision is designed to maintain long term viability of Forest Service sensitive species and contribute to the recovery of threatened, endangered, and proposed plant species and ensure management activities do not contribute to population declines

Aquatic and Riparian Species Conservation Assessments – This decision is designed to maintain long term viability of Forest Service sensitive species and contribute to the recovery of threatened, endangered, and proposed riparian species dependent on riparian and aquatic ecosystems, and ensure management activities do not contribute to population declines. My intent is to complete conservation assessments, in cooperation with other State and Federal agencies, universities, and

research scientists, for the following sensitive species: foothill and mountain yellow legged frogs, Cascades frog, Yosemite toad, and northern leopard frog …".

We find it impossible to understand how "treatments" in riparian areas that will doubtless INCREASE water temperatures, EXPOSE soils to accelerated erosion and sedimentation, and provide the extremely large livestock herds currently grazed here as well as an unknown number and type of additional livestock access to riparian areas – will promote viability rather than extirpation.

Also from the SFNP:

"The fundamental principle of the Aquatic Management Strategy is to retain, restore, and protect the processes and landforms that provide habitat for aquatic and riparian-dependent organisms, and produce and deliver high-quality waters for which the national forests were established.

Riparian conservation areas (RCAs) are designated along streams and around water bodies directed at (1) preserving, enhancing, and restoring habitat for riparian and aquatic-dependent species, (2) ensuring that water quality is maintained or restored, (3) enhancing habitat conservation for species associated with the transition zone between upslope and riparian areas, and (4) providing greater connectivity within watersheds.

In addition, critical aquatic refuges (CARs) have been designated in small sub-watersheds that contain known locations of threatened, endangered, or sensitive species; highly vulnerable populations of native plant or animal species; or localized populations of rare native aquatic or riparian-dependent plant or animal species".

We Object to the failure to provide a necessary hard look site-specific analysis to ensure that all of these requirements are met. We are greatly concerned that the EA actions will in fact significantly HARM rather than improve ALL of these elements. We Object to the failure of a candid hard look analysis under NEPA that is necessary to ensure compliance with NFMA.

Appendix A of this Record of Decision contains the standards and guidelines for the protection of riparian and meadow areas.

Willow Flycatcher Conservation Assessment – My intent is to develop a conservation assessment for willow flycatchers by the end of calendar year 2002. This conservation assessment will include: mapping of meadows, identifying suitable willow flycatcher habitat, identifying willow flycatcher occupancy and relative abundance, identifying emphasis habitat and small wet meadows, and identifying habitats that can contribute to population expansion.

We Object to the failure to provide the public with this basic map, and info on the local and regional flycatcher population, and habitat and population expansion or contraction info, since the map referred to in the Plan was initially created for the project area and surrounding landscape so that informed public comment can be made, and stress that springs and meadows and crucial info on ephemeral vs, intermittent vs. perennial stream reaches is lacking in the EA.

SNFP: "*Sierra mixed conifer forests have a natural heterogeneity of seral stages, species composition, and stand structure. Natural processes such as fire, and insect and pathogen incidences, as well as edaphic or microclimate conditions result in spatial heterogeneity across the landscape. Thus at any given time even "pristine" forest would be expected to contain patches of varying size in different size and age classes. Silvicultural practices may mimic natural heterogeneity of forest landscapes. Basic forest ecological principles will be employed to design such conditions, consistent with the size and intensity of natural disturbance agents*".

The SNFP states it addresses:

- *Management Direction and Goals;*
- *Desired future conditions expected over the next 50 to 100 years;*
- *Standards and guidelines to be used in designing and implementing future management actions;*
- *A strategy for inventory, monitoring and research to support adaptive management.*

Yet the EA fails to take into account the immense changes in scientific knowledge about climate change stress, the megadrought, the very abundant information on how fires are actually burning and the failure of extensive logging, treatments, thinning, veg clearing, and grazing to address fire risk, and all manner of other new scientific information on species declines (such as the shocking declines of migratory birds especially on forest habitats - see Rosenberg et al. 2019, Pinyon Jay, Boone et al. 2020, Sage-grouse USGS Remington et al 2021) that was not known and was not assessed at the time the flawed "desired conditions" and bogus models were adopted. The fact that the SNFP is now 20 years old – and the Toiyabe forest Plan dating from the pre-Internet use era of the 1980s shows the great need for substantial updated scientific review of al aspects of this project in an EIS.

The FS can't rely on 20-year-old desired condition models when drastic climate change is taking place, and re-writing scientist expectation of what would take place even a decade ago.

See for example THIS from *California Water Blog*:

https://californiawaterblog.com/2021/07/18/californias-missing-forecast-flows-in-spring-2021-challenges-for-seasonal-flow-forecasting/

https://californiawaterblog.com/2021/07/18/californias-missing-forecast-flows-in-spring-2021-challenges-for-seasonal-flow-forecasting/

9/18/21, California Water Blog, California's Missing Forecast Flows in Spring 2021. Abatzaglou et al. on Snow Droughts, No April Showers, Sublimating Snow, Dy Previous Year (Antecedent) conditions), over-estimated Snow Water Equivalents. Implications not just for California … WHERE did the snowpack water go in 2021?

RE: Old rules of thumb and old models

“ … modeling studies are showing that old rules of thumb are becoming less reliable for anticipating water resources in a changing climate and demand significant updates. Improved understanding of mountain processes that involve snow, soil, and vegetation may help improve forecasts. Previous studies show substantial changes in how water years play out with climate change in California – including more frequent dry and critically dry water years. Back-to-back snow droughts – like we experienced in 2020 and 2021 – are projected to become increasingly likely in the Sierra Nevada with continued warming. Likewise, we expect new types of water years that we have not seen in modern times that will challenge operational water forecasting and allocation decisions. More critical calculations will support better understanding to improve forecasts, allocations, and flexible management”.

The article contains this list of supporting scientific

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We Object to the FS trying to rely on this antiquated management EA forward – and the lack of serious consideration of info the very significant risk of permanent and irreversible ecological and habitat losses that may result from the FS's reckless attitude towards destruction of native vegetation communities to produce hotter, drier, windier, weedier, more fire prone and LESS RESILIENT and LESS able to recover from radical treatment disturbances vegetation communities. There is great risk the project will irreversibly harm, and NOT conserve and restore sensitive and other rare species habitats and populations.

The SNFP states:

"Grazing standards and guidelines: The conservation strategy includes standards and guidelines for modifying grazing practices in occupied or historic flycatcher habitat. Surveys of known willow flycatcher sites to determine occupancy and management are required. If surveys detect willow flycatchers, livestock grazing would be prohibited in the entire meadow. If surveys do not detect willow flycatchers, to permit recovery of the meadow and increase the likelihood of recolonization of these historically occupied sites by flycatchers, late season grazing could occur with utilization levels based on habitat condition. Within emphasis meadows (meadows within 5 miles of historically occupied sites), surveys for presence of flycatchers are required within the next 3 years. Where flycatchers are detected, grazing would be prohibited during the willow flycatcher breeding season (June 1 to August 31) unless multi-year monitoring data support different dates for a specific breeding location. In addition, all emphasis meadows within 5 miles of new sites where flycatchers are detected must also be surveyed for presence of flycatchers. In these emphasis meadows where flycatchers are detected, late-season grazing would be applied to enhance flycatcher productivity and contribute to continued population expansion. Beginning in 2003, livestock could not graze in unsurveyed known willow flycatcher sites. The combination of more restrictive grazing standards in meadows throughout the Sierra Nevada, and elimination or reduction of grazing intensity in occupied sites will provide habitat conditions that allow for maintaining and increasing habitat to support viable populations of flycatchers".

We object to the failure of the EA and the FS's flawed models to recognize this current EXISTING amount of natural heterogeneity and biodiversity – while claiming that only through radical disturbances can the lands, forests, shrub communities be considered "heterogeneous and biodiverse".

"*Fisher Habitat Suitable habitat will be retained to allow for fisher population expansion and possible re-introductions throughout the Sierra Nevada outside of the defense zone of the urban wildland intermix*". We Object to the FS purging, chipping up and burning mature forest vegetation and dead and dying trees for dens and surrounding forest cover that might provide current and/or future habitat for Fishers.

We Object to the EA's major forest habitat disturbance actions, as they are not compatible with the SNFP's requirements: "Sierra Nevada Red Fox, Marten and Wolverine"

"The conservation strategies contain three critical elements for Sierra Nevada red fox, marten and wolverine conservation: (1) recover and protect populations, (2) minimize fragmentation, and (3) protect den sites".

AND: "*Suitable habitat will be retained for Sierra Nevada Red Fox and marten throughout the Sierra Nevada outside of the defense zone of the urban wildland intermix. No forested stands in these areas will be reduced below 50 percent canopy cover.*

Minimize Fragmentation Old forest habitat fragmentation will be minimized. The potential impacts of fragmentation will be assessed in biological evaluations including the locations of new landings, staging areas, recreational developments, including trails and other disturbances. Project level and landscape analyses will include a consideration of general forest linkages that are connected via riparian areas and ridge top saddles, with canopy closure greater than 40 percent.

Protect Den Sites Upon a detection (photograph, track plate, or siting verified by a wildlife biologist), an analysis will be performed to determine if activities within five miles of the detection have a potential to impact Sierra Nevada red fox. For a period of two years following the detection, activities will be restricted from January 1 through June 30 that are determined in to have an adverse impact.

Verified marten birthing and kit rearing dens will be protected with buffers consisting of 100 acres of the highest quality habitat in compact arrangement surrounding the den site in which a limited operating period (LOP) from May 1 through July 31 in employed. Existing uses will be evaluated for the appropriateness of LOP's as part of the systematic landscape analysis process to be conducted across the Sierra Nevada".

We Object to the failure of the EA to ensure adequate forest habitat to conserve and restore these species – as the project will destroy critical older and mature and denser complex forest area habitats.

We have also mailed a CD with literature supporting this portion of our Objection.

Sincerely,

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