

DEPARTMENT: Board

BY: Supervisor Doug Balmain

PHONE: 966-3222

RECOMMENDED ACTION AND JUSTIFICATION: (Policy Item: Yes \_\_\_ No X)

Authorize Chairman to sign letter to the USDA Forest Service relative to the Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement.

BACKGROUND AND HISTORY OF BOARD ACTIONS:

LIST ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

- Authorize Chairman to sign letter commenting on the Sierra Nevada Forest Plan Amendment Draft EIS.
- Do not sign letter and forfeit the opportunity to provide comments to the Forest Service.

COSTS: ( ) Not Applicable

A. Budgeted current FY \$ \_\_\_\_\_

B. Total anticipated costs \$ \_\_\_\_\_

C. Required additional funding \$ \_\_\_\_\_

D. Internal transfers \$ \_\_\_\_\_

SOURCE: ( ) 4/5ths Vote Required

A. Unanticipated revenues \$ \_\_\_\_\_

B. Reserve for contingencies \$ \_\_\_\_\_

C. Source description: \_\_\_\_\_

Balance in Reserve for Contingencies, if approved: \$ \_\_\_\_\_

SPECIAL INSTRUCTIONS:  
List the attachments and number the pages consecutively:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

CLERK'S USE ONLY:

Res. No.: 00-29 Ord. No. \_\_\_\_\_

Vote - Ayes: \_\_\_\_\_ Noes: \_\_\_\_\_

Absent: 2 Abstained: \_\_\_\_\_

( ) Approved ( ) Denied

(X) Minute Order Attached ( ) No Action Necessary

The foregoing instrument is a correct copy of the original on file in this office.

Date: \_\_\_\_\_

ATTEST: MARGIE WILLIAMS, Clerk of the Board  
County of Mariposa, State of California

By: \_\_\_\_\_  
Deputy

ADMINISTRATIVE OFFICER'S RECOMMENDATION:  
This item on agenda as:

Recommended

Not Recommended

For Policy Determination

Submitted with Comment

Returned for Further Action

Comment: \_\_\_\_\_

\_\_\_\_\_

A.O. Initials: MB

# Mariposa County Board of Supervisors

District 1.....PATTI A. REILLY  
District 2.....DOUG BALMAIN  
District 3.....ROBERT C. STEWART  
District 4.....GARRY R. PARKER  
District 5.....BOB PICKARD



County Administrative Officer

**MARGIE WILLIAMS**  
Clerk of the Board

P.O. Box 784  
MARIPOSA, CALIFORNIA 95338  
(209) 966-3222  
1-800-736-1252

FAX (209) 966-5147

July 24, 2000

USDA Forest Service-CAET  
Sierra Nevada Framework Project  
P.O. Box 7669  
Missoula, MT 59807

Re: Comments on Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement (Sierra Nevada and Modoc Plateau)

Dear Forest Service Personnel:

Thank you for providing the County of Mariposa with a copy of the "Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement" hereinafter referred to as "Plan," and the opportunity to comment on the contents thereof. The Plan consists of three voluminous documents together with a package of maps. We believe that the fast tracking of the Plan that the federal government has established for public review and adoption is far too compressed to allow either the Board of Supervisors or the general public sufficient time to review the documentation and make meaningful comments. We respectfully request that the public comment period be extended for a minimum of ninety days. Because the Board of Supervisors is operating under your restricted timeframe the Board makes the following comments relative to the Plan. We strongly urge the Forest Service to give serious consideration to the comments contained herein.

## **1. PLAN IS TOO COMPLEX IN ITS PRESENT FORM**

The Plan, as stated above, is extremely voluminous and has many interrelated processes that have not been coordinated. There are too many alternatives and too many discretionary acts allowed within the alternatives to allow the public to in any way digest the information and make comments of a meaningful nature on the Plan as a whole.

## **2. CUMULATIVE IMPACTS ARE NOT PROPERLY ADDRESSED**

The cumulative impacts of the Plan together with other actions that have been proposed or taken by the Forest Service and the federal government relative to use on Forest Service lands are significant but they have not been tied together in any meaningful way in the Plan. There is no attempt made to correlate this Plan with the "Roadless" proposal even though it is clear that the two concepts are interrelated. As stated in no. 1 above, there are too many options within each alternative that are not significantly dealt with in terms of cumulative impacts, thereby leaving the reader of the Plan with no real understanding of how all of these possible alternatives and

options within alternatives will operate together with other actions proposed or taken by the federal government.

### **3. DOES THE "SCIENCE" TRULY SUPPORT THE FOREST SERVICE PLAN PROPOSALS?**

We question whether or not the "five problem areas" which are discussed at length in the Plan are in fact significant problem areas. There does not appear to be any objective evidence in the "science" which is touted in the Plan to support the Forest Service's position. For example, in many places where the Plan discusses the five problem areas the language reads, "it is thought" rather than providing any objective evidence through science that the statement is accurate. There is no objective evidence contained anywhere in the Plan that pre-European status of the forest is in any way superior to the man managed diverse use philosophy of the forest. The Forest Service needs to make decisions regarding management of the forest based upon real objective scientific evidence, not politics.

### **4. ALL POSSIBLE ALTERNATIVES HAVE NOT BEEN DISCUSSED**

The Plan in its present configuration does not address all possible alternatives. By way of example, there is no real discussion and analysis of thinning and maintaining by selective cutting of the forest. The demand for forest products remains high by consumers and the Plan as proposed totally ignores the mission of the Forest Service to provide diverse use of the forest. The virtual elimination of selective cutting of the forest will drive the prices even higher for the consumers who need and demand forest products. A similar argument can be made relative to cattle grazing. The presentation presented to the Board of Supervisors by the Forest Service staff indicates a drastic drop in the number of acres that will be permitted to be grazed in Mariposa County as well as the entire forest. This is a continuation of the decline that we have seen over the last several years of allowable grazing land in the forest. The demand for cattle products has not in any way diminished, however, the Forest Service is proposing a plan that will severely restrict and probably eliminate grazing in the national forests without any real scientific evidence that the grazing creates significant problems for the forest.

The Plan is a "one size fits all" concept and will not work on the ground evenly. Local Forest Service managers need authority to make decisions on a local level relative to the diverse use of the forest land. It would appear to be more prudent to adopt a management strategy that incorporates the issues, conditions, environmental concerns and socio/economics of a particular area and to address the problems from that standpoint. Using the input of local governments, landowners, businesses and stakeholders would provide a more balanced and equitable decision as to the management process for local areas. By way of example, another alternative that could have been considered in the Plan would be to try different management techniques in different forests and reevaluate those techniques at a specified time in the future.

## 5. FUEL LOAD

The forest covered by the Plan represents a significant threat to development contiguous to the forest and to itself as a result of reductions or maintenance in fuel buildup. Today, by all USDA accounts, the fuel loading has grown, unimpeded, for 30 years. The Sierra will, in the planning life of the "Framework," experience catastrophic fires that will destroy portions of the forest, the habitat and life. Significant risk exists for the fire fighting personnel due to the enormity of the fuel status.

The Plan represents a number of Alternatives to deal with the issues however, each is inadequate to mitigate the potential destruction. We suggest consideration of the following:

Salvage and Green Timber Sales. The Forest Service must prepare a sound forest management plan for the mid-elevation pine forest that considers what we believe are the highest priorities for that zone – protected watercourses and the control of catastrophic fires. We believe that the only practical method for fire hazard reduction over the large mid-elevation zone is to plan for a combination of commercial thinning, salvage and selective harvests along major ridges that divide the zone. We further believe that harvest operations can be designed to protect watercourses, to clean up slash and to remove a significant portion of fuels that are a threat to the safety of our forests.

The past 15 or 20 years of no management of our national forests has struck a serious blow to the 70 or 80 years of active forest management practiced by your predecessors. As long-time residents of lands surrounding the national forest, we urge you to return to sound forest management practices. Strengthen your controls to make it work to protect our resources, but manage!

Fuel Reductions. The Plan indicates that the average number of acres lost annually to wildfire now approaches 76,000 in the Sierra. An increase from 47,000 acres in one decade. Considering statistical probabilities, the increase will not stop at 76,000 acres but will climb with time and will reflect the minimal effort taking place in any of the alternatives to reduce fuels.

Failure to keep pace with the fuels through mechanical thinning and clearing and/or by prescribed fire has placed the forests in a critical situation demanding extraordinary effort to mitigate, the Plan fails to adequately mitigate the fuel loading problem. Additionally, we believe that attempting to reduce fuels primarily by prescribed fires will exacerbate an already existing air quality problem in the Sierra foothills. We join in the comments of a letter addressed to the California State Air Resources Control Board by the Regional Council of Rural Counties, dated July 14, 2000, regarding this issue. A copy of the referenced letter is enclosed.

**6. IS FUNDING AVAILABLE FOR ANY OF THE ALTERNATIVES?**

Does the Forest Service have sufficient funds to institute any of the alternatives contained in the Plan? The forests cannot be properly managed without adequate funding and resources.

**CONCLUSSION**

In our opinion, the ultimate result of implementation of any of the alternatives contained in the Plan will result in the Forest Service not managing the forest but serving as caretakers of the forest to allow day hikers to enjoy the forest to the exclusion of all other diverse activities. It is further our opinion that this proposal not only violates, but also emasculates the mission of the Forest Service established by Congress for "diverse use" of the federal forest land. The Board of Supervisors of Mariposa County appreciates the opportunity to comment on the Plan and respectfully requests that the Forest Service give serious consideration to our comments contained herein.

Very truly yours,



Garry R. Parker, Chairman  
Mariposa County Board of Supervisors

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encl/as stated



CHAIR – EDWARD T. BAMERT, AMADOR COUNTY  
FIRST VICE CHAIR – ROBERT MEACHER, PLUMAS COUNTY  
VICE CHAIR – LINDA ARCULARIUS, INYO COUNTY

SECRETARY – BRIAN DAHLE, LASSEN COUNTY  
TREASURER – BILL MERRIMAN, LAKE COUNTY  
RCRC STAFF - MARCIA L. BASQUE, PRESIDENT

July 14, 2000

Mr. Michael Kenny  
Executive Director  
State Air Resources Board  
2020 L Street  
Sacramento, CA 95814

Dear Mr. Kenny,

The Forest Service has recently proposed a draft environmental impact statement (DEIS) that will amend its management plans for each Sierra Nevada Forest. The DEIS, commonly referred to as the Sierra Framework, seeks to reduce forest fuels principally through prescribed fire. The Regional Council of Rural Counties represents 28 rural California counties that will be impacted by this proposal. We therefore request an analysis from the Air Resources Board as to the feasibility of increasing the use of prescribed fire on Forest Service lands and the degree to which otherwise permitted projects would be curtailed in order to fully implement the proposed prescribed fire program. Please include an analysis under the current PM<sub>10</sub> rules and the pending PM<sub>2.5</sub> standards. We would expect the fuel levels that would be consumed on a per acre basis would be much greater than per acre levels of current prescribed fire projects due to the concentration of treatments in high fire hazard zones.

The Forest Service has proposed eight alternatives for management of the national forest lands. Acres proposed for prescribed fire vary from 25,398 to 88,430. Please note that Alternative 1, sometimes referred to as the no action alternative, is not representative of current conditions due to a lack of full implementation. The Forest Service estimates the proposed alternative will increase proscribed fire by up to 50%. We are concerned that the planned increase in burning will not be permitted without reductions in existing permitted projects. Your analysis is important for us to fully discharge our responsibility to protect the health and safety of our rural community citizens.

The public comment period closes August 11. Therefore, your timely review would be appreciated. Please notify us as to an estimate of when your analysis will be completed so that we may plan accordingly. We appreciate your help and look forward to your analysis.

Sincerely,

John B. Hofmann  
Director, Natural Resources

Cc: Mr. Brad Powell, Regional Forester, USDA Forest Service  
The Honorable Delegates of Regional Council of Rural Counties  
Mr. Wesley J. Lujan, Vice President, RCRC