



November 30, 2016

Eric La Price, District Ranger
Western Divide Ranger District

Dear Mr. La Price,

On behalf of the John Muir Project of Earth Island Institute and the Center for Biological Diversity, we are submitting the following scoping comments on the proposed hazard tree logging project in the Cedar fire area (Sequoia National Forest news release, Oct. 31, 2016).

1: The proposal does not appear to have gone through the proper process of public notification and comment under NEPA. Nowhere can we find this proposal on the Sequoia National Forest's online Projects page, nor can we find it on the forest's current Schedule of Proposed Actions. Please withdraw the current proposal until after proper public notice and comment have been solicited.

2: The Forest Service's 10/31/16 press release states that trees "deemed as hazards" would be felled, and many removed, "within 300 feet of the road", citing to the Forest Service's "Hazard Tree Guidelines for Forest Service Facilities and Roads in the Pacific Southwest Region". However, these guidelines do not identify a zone of such huge width—a 600-foot wide swath (300 feet on each side of the roads). In fact, the Guidelines describe hazard trees as trees that could actually fall on the road. Is an 80-foot tall snag that is located 200 feet away from a road, on level ground, a hazard tree? Or a 120-foot tall snag located 290 feet from a road on level ground? How about a 120-foot tall snag located 100 feet from a road, but down a steep slope far below the road, and leaning downslope away from the road? The logging proposal, as described in the press release, is far too broad and does not even follow the Guidelines. Moreover, the Guidelines themselves have never undergone a NEPA analysis through an EIS, so reliance on them is improper under NEPA.

3: Careful analysis is also important given the potential impacts to California Spotted Owls and Pacific Fishers and their habitat, and an EIS should be conducted here to address such significant impacts. The Forest Service's California Spotted Owl Technical Report (Verner et al. 1992), p. 86, states that spotted owls in the southern Sierra Nevada select habitat with about 20 snags per acre 15 inches in diameter *or larger* (and this did not include snags less than 20 feet tall, so the actual snag densities would have been even higher). On p. 96 of the Technical Report, it states that, in terms of snags, spotted owl nesting/roosting habitat in the Sierra Nevada is defined by 30 to 55 square feet per acre of snag basal area. For perspective, a snag 15 inches in diameter at breast height has 1.23 square feet of basal area, so 55 square feet per acre of snag basal area equates to about 45 snags per acre, *on average*. Even if the snags were an average of 24 inches

in diameter, 55 square feet per acre of snag basal area equates to an *average* of about 18 snags per acre. Page 86 of Verner et al. (1992) further states that the percent coefficient of variation for this large snag density was 132—i.e., the standard deviation was 1.32 times larger than the mean. Given that the mean was 19.5/acre, this means that the standard deviation was 25.7, which means that 34% of the nest habitat had large snag densities up to one standard deviation above the mean—i.e., 45 per acre, and 16% (over one standard deviation above the mean) had *more than* 45 per acre. With regard to Pacific fishers and their resting habitat in the southern Sierra Nevada, Purcell et al. (2009), Table 3, found that one of the most important variables was high snag basal area, which averaged 0.5 square meters per 0.07-hectare plot, or 5.4 square feet per 0.173 acres—i.e., about 31.2 square feet per acre. The standard deviation was 0.7 square meters of snag basal area per 0.07-hectare plot, which equates to about 43.7 square feet per acre. This means that about 34% had snag basal area up to 75 square feet per acre (up to one standard deviation above the mean), and 16% (over one standard deviation above the mean) had snag basal area of more than 75 square feet per acre. Clearly, when two of the key indicator species for these forests are preferentially selecting forests, for nesting/roosting and denning, that have dozens of snags per acre, these conditions are important for these species, and removing large swaths of snags could have significant adverse impacts.

4: We also request that you fully consider an action alternative that would: a) limit hazard tree felling to trees that are likely to fall and hit the road in question; b) leave all or most felled trees on the ground as large downed log habitat for wildlife; c) drop the roadside logging proposed in the Giant Sequoia National Monument along roads 24S93, 24S94, 24S93A, and 24S93B, as these roads are dead-end old logging roads that are not necessary for access to trails, campgrounds or inholdings (e.g., trail 31E60 is accessed from the west, from the road that passes Poso Cabin on the way to Panorama Heights), and instead convert these roads to Maintenance Level 1; and d) drop the trailside logging in the Uninventoried Roadless Area west of Forest Service road 24S15.

5: To the extent that proposed tree felling along roads in the Sequoia Monument would be associated with removal of trees (as opposed to leaving them on the ground), this does not appear to be consistent with the Giant Sequoia National Monument Proclamation, or the management plan for the Monument, since “removal” of the trees would not be “clearly needed” either for public safety or ecological restoration—even in areas where the minimum downed log standards would be met or exceeded by the levels of downed logs that would occur after hazard tree felling.

6: The trailside logging proposed along the Bohna Peak Trail and Sunday Peak Trail are inside of an Uninventoried Roadless Area that could otherwise become designated Wilderness in the future if not logged. The trailside logging would have a potentially significant adverse impact on the Wilderness character of this area, and is also another reason to conduct an EIS. Further, the Sequoia National Forest forest map does not even show these trails, so their importance is uncertain. We request that you either close these trails, to the extent that they exist, or leave them open but post warnings about potential for snagfall. Further, no trees should be removed from this Roadless Area.

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