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10 November 2011

John Exline, District Ranger
Marianne Emmendorfer mmemmendorfer@fs.fed.us
Hume Lake Ranger District
35860 E. Kings Canyon Road
Dunlap, CA 93621

RE: Supplemental Comments re: Hume Roadside Hazard Tree Salvage Project

Dear Mr. Exline:

Thank you for the informative field trip on October 25, 2011 where René Voss and I were joined by other Forest Service staff: Marianne Emmendorfer, Larry Burd, Penelope Shibley, and Martin MacKenzie. Please add this letter/declaration to the administrative record for the Hume Roadside Hazard Tree Salvage Project.

During the field trip we rode together in a Forest Service vehicle from Quail Flat, down Forest Service Road 13S09 to 13S98 and into the Bearskin Grove, then back to Quail Flat looking at marked trees and giant sequoia trees while discussing the project and the options for treatment. The following is a summary of what I and René Voss heard you and other Forest Service persons say during our field trip.

We discussed the hazard tree guidelines and the threat to roads as a justification for tree felling when the R5 guidelines do not specify the road as a target.

You said that you will first decide the felling of the hazard trees on the list you provided us and later and separately whether the trees slated for felling will be left in the forest or would be removed after being felled.

You also asserted that hazard danger trees will increase with time if they are left standing. You or another Forest Service person on the field trip said that Region 5 does not yet have approved road hazard tree guidelines, so you plan to use the Sequoia guidelines, which are titled Hazard Tree Procedures for Forest Plan Compliance, dated August 5, 2004.

You or another Forest Service person on the field trip said that Region 5 requires gathering data on tree failures and that Jim Whitfield keeps the data or the history regarding these tree failures.

You also told us that you don't yet know whether the project will be categorically excluded from NEPA or whether an environmental assessment will be prepared, and you

said that this decision will be based on the comments on the project from the public and the new Forest Supervisor.

You also stated that you will be preparing surveys of downed logs and standing dead trees (snags) in the Hume Roadside Hazard Tree Salvage Project area.

You also said that it is possible and even feasible to eliminate the falling hazard from those identified hazard trees by felling them and leaving them where felled. And you said that it is possible and feasible to just fell and leave and then burn the slash, limbs, and tops to reduce any fire-hazard. Moreover, you said that many of the trees proposed for felling would probably be left in place or pulled away from the road after felling.

We also heard you say that a reason you were planning to remove the trees was to help pay for the project with receipts from the sale of the trees as timber, but that the project could be implemented without selling trees by using “force accounts” and using just Forest Service personnel.

We declare, under penalty of perjury, that the foregoing statements we heard are true and correct to the best of our knowledge and recollection.

Executed on November 10, in Weldon and San Anselmo, California, by



Mr. Ara Marderosian
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