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Sent to:
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Jeff Cordes, District Wildlife Biologist
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cc: Ara Marderosian
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Joe Fontaine
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Subject: Tenmile Aspen Restoration Project Scoping Comments for Sequoia ForestKeeper & the Kern-Kaweah Chapter of the Sierra Club

Sequoia ForestKeeper (SFK) and the Kern-Kaweah Chapter of the Sierra Club (the Club) thank you for the opportunity to provide scoping comments.

For this project, the Forest Service proposes to fell approximately 120 red fir and incense cedar trees in five remnant aspen patches on a total of approximately 16 acres in the Hume Lake Ranger District, with the goal of reducing the decline of aspen stand distribution due to conifer encroachment and to enhance wildlife habitat. The project scoping documents states: “Most of these trees are smaller than 12” dbh, the rest between 12-16” dbh. Smaller material would be piled and burned or chipped. Large down woody material would be left in place or made available to the public for fuelwood.”

In general, SFK and the Club do not oppose felling firs to restore aspen stands to restore these patches for the benefit of wildlife, so long as the larger felled trees are first used in the project area to meet the Monument Plan’s down woody material standard for wildlife and soil protection. The Monument Plan requires that vegetation management projects in the Monument leave or achieve down log levels of 10-20 tons per acre from logs that are a minimum of 12 inches in diameter. *See* GSNM Plan, p. 87.

We do not object to allowing felled trees smaller than 12 inches to be used by personal wood cutters; however, the Forest Service must prohibit personal wood cutters from removing any logs 12 inches or greater if the site is below or near the lower end of the 10-20 ton per acre standard. To assure the standard will be met, the Forest Service must first gather quantitative data about the existing down log levels in each part of the project area. Only then can the Forest Service assure that the standard can be met or that any felled trees can contribute to the standard if the area is below its minimum.

Since these 5 remnant patches are isolated from each other, we request that down log levels for each patch be gathered so the Forest Service can assure that it can eventually meet the standard in each of the patches.

If the patches are below the standard or even if they are near the lower end of the standard, the Forest Service must prohibit removal of any logs 12 inches and greater for use as personal fuelwood, similar to the prohibitions the Forest Service has for personal firewood gathering in giant sequoia groves. *See* GSNM Plan, p. 37 (Firewood cutting and gathering is prohibited inside giant sequoia grove administrative boundaries, unless an exception is granted based on specific site conditions or circumstances.)

Before gathering this data and analyzing any contributions from felled trees to meet the down log standard, the Forest Service should not plan to allow personal fuelwood gathering in the aspen patches. In fact, if the Forest Service cannot provide quantitative assurances that the down log standard can be met, it should simply remove fuelwood gathering as an aspect of the project and explain to the public why it will be prohibited in the project area.

The need for more large down logs in most areas of the Giant Sequoia National Monument

The project area is within the Southern Sierra Fisher Conservation Area. In general, removal of felled trees adversely impacts the prey base of the Pacific fisher whose habitat is strongly associated with mature/old-growth forests and the habitat structures inherent in such forests, including downed logs. The habitat needed by the Pacific fisher consists of mature and old-growth forest with high canopy cover, large trees and snags, and an abundance of large downed logs (fallen trees). One of the key reasons why adequate levels of large downed logs are important for fishers is that such logs provide habitat for fisher's small mammal prey base (Lofroth et al. 2010). In the southern Sierra Nevada, fishers prey predominantly on small mammals (Zielinski et al. 1999), and these small mammals live in the natural cavities and crevices in large downed logs (Smith 2000). Purcell et al. (2009) found that fishers were positively associated with significantly higher levels of large downed logs, consistent with other research (Lofroth et al. 2010). Thus, felled trees in the project area would enhance fisher habitat by creating structures in which an abundance of small mammals would live, and would radiate outward into the forest to find food, thus making themselves available as prey to Pacific fishers. Conversely, removal of such felled trees would adversely affect fisher populations by diminishing habitat for their prey, and thus reducing their food availability—particularly in an area that is currently somewhat low with regard to downed logs.

The California spotted owl also depends upon mature and old-growth forest with high canopy cover, many large live trees and large snags, and an abundance of large downed logs. *See* USDA 2001 (Vol. 3, Chpt. 3, part 4.4, pp. 69-102). The owls nest in large live trees and large snags (in cavities), and feed upon small mammals that use large snags and large downed logs as habitat. *Id.* Thus, for reasons very similar to those described above with respect to the Pacific fisher, removing large downed logs would diminish habitat for the owl's prey.

The 2004 Sequoia National Forest Inventory specifically gathered data on logs over 10 inches in diameter

http://www.fs.fed.us/r5/rsi/projects/inventory/invdata/sequoia/04summary/sqfplus04_1inv-ALL.sum.trpt-log.html#logs. This data shows that the average existing tons per acre of downed

logs over 10 inches in diameter in the forest types found in the Hume Lake District are: 6.5 (Jeffrey pine)¹; 10.2 (mixed conifer)²; 9.4 (red fir)³; and 0.0 (white fir).⁴

The only forest type that is somewhat close to the minimum is mixed conifer, which has 10.2 tons per acre, but this amount is for logs over 10 inches in diameter. Logically, the tonnage of large downed logs over 12 inches in diameter would be less, and would certainly be under 10 tons per acre for each forest type in the Hume Lake District.

It follows then that the likely tonnage of large down logs in the remnant aspen patches would also be low, as it is everywhere else in the district. Therefore, the presumption must be that the Forest Service must restrict personal fuelwood gathering of the felled trees in these patches.

Grazing

The Forest Service's short primer, titled "Managing Aspen Habitat for Birds in the Sierra Nevada" (attached and cited in the scoping notice) includes the following as a management strategy to enhance aspen bird habitat:

5. Limit grazing and over-browsing. Grazing and over-browsing can significantly reduce aspen regeneration, understory foliage volume, and the structural diversity important for numerous bird species. Grazing may also increase cowbird abundance which can negatively impact breeding birds.

We urge the Forest Service to include eliminating grazing, if there is any, in and around these aspen patches as a part of this project.

General Comments and Questions

In general, the scoping notice lacks detail on how the aspen regeneration will be promoted other than removal of conifers. Felling competing trees may not be enough to allow for complete restoration success. Moreover, there is no mention or discussion of other factors that may be causing the decline of the aspen. We have several questions that should be answered as a part of this analysis:

- What protocols are being followed?
- Will Sequoia National Forest staff contact staff in the Kaibab National Forest to learn of their success and failures on their aspen regeneration project on the Kaibab Plateau?

¹ Averaging the totals for LOG-131J2N, LOG-131J2P, LOG-131J3N, LOG-131J3P, LOG-131J4G, LOG-131J4N, LOG-131J4P, and LOG-131J3S (see "Strata with no LOGs" at bottom of page for LOG-131J3S).

² Averaging the total for LOG-131M1X, LOG-131M2G, LOG-131M2P, LOG-131M2S, LOG-131M2X, LOG-131M3G, LOG-131M3N, LOG-131M3P, LOG-131M3S, LOG-131M3X, LOG-131M4G, LOG-131M4N, and LOG-131MNO.

³ Averaging the totals for LOG-131R1X, LOG-131R2X, LOG-131R3G, LOG-131R3N, LOG-131R3P, LOG-131R3X, LOG-131R4N, LOG-131RNO, LOG-131R2N, and LOG-131R4S (see "Strata with no LOGs" at bottom of page for LOG-131R2N and LOG-131R4S).

⁴ See "Strata with no LOG" at bottom of page.

- Will Sequoia National Forest staff apply scientific research from “**Ecology, Biodiversity, Management, and Restoration of Aspen in the Sierra Nevada**” (RMRS-GTR-178, see attached) for this restoration project. Therein, “[d]escriptions of the types of aspen that occur in the Sierra Nevada are presented along with alternative techniques to manage and restore aspen that are applicable wherever aspen is found.” (see Abstract, PDF p. 2).
- What is the condition of the water table along the streams near the aspen patches?
- Will there be any topping of aspen or fire introduced to promote suckering?
- Will the aspen patches be fenced to exclude browsers from eating the new aspen shoots?

Please provide answers to these questions in your analysis.

Broken or Incorrect Web Links

Finally, we would like to point out that several of the links to web sites referenced in the scoping notice and the referenced white paper on aspen habitat for birds are broken or provide the incorrect web address. First, the link in the scoping notice (<http://www.prbo.ore/cms/docs/edu/NSierraAspen.pdf>) to “Managing Aspen Habitat for Birds in the Sierra Nevada” is incorrect. We did find the document with a Google search (see attached); however, that document also includes broken or incorrect links, including www.aspensite.org, <http://www.fs.fed.us/rm/aspen/>, and www.fs.fed.us/psw/programs/snrc. This should be rectified, and you may want to re-scope the project for this reason alone. Please provide us with the corrected links.

If you have any questions, please contact the undersigned.

For Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club,



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