



25 January 2016

Dean Gould, Forest Supervisor
Sierra National Forest
1600 Tollhouse Rd. Clovis, CA 93611

SUBMITTED ELECTRONICALLY VIA EMAIL:

To: comments-pacificsouthwest-sierra@fs.fed.us

Re: French Project: Logging in Roadless Areas COMMENT #2

Dear Mr. Gould,

On behalf of Sequoia Forest Keeper, Kern-Kaweah Chapter Sierra Club, and Sierra Club California/Nevada Wildlife Team, I am submitting these comments on the Forest Service's proposal to conduct over 1,000 acres of post-fire logging of live and dead trees including clearcutting of live and dead old growth trees, within Roadless Areas in the French fire of 2014 on the Sierra National Forest.

We reviewed the two documents associated with the Sierra National Forest's proposal to build or re-create roads, and conduct post-fire logging and clearcutting of live and dead trees, in two Roadless Areas in the French fire--specifically, we refer to the Wilderness Report and the Burkindine Declaration. These documents simply make unverified assertions about half-mile "pinch-points" between long unused roads, old underground water pipes that the Forest Service is calling "aqueducts", and a powerline at the edge of one Roadless Area. The Forest Service then uses these assertions to argue, essentially, that the Roadless Areas are not really roadless and thus no harm to roadless or wilderness characteristics need be evaluated.

However, without having the ability to safely access the physical locations of these areas, and do so while there is not snow covering the ground, we cannot meaningfully and fully address the veracity of the arguments used by the Forest Service to disqualify the great majority of the Roadless Areas from Roadless designation, and we cannot gather evidence--photographic and otherwise--to provide to the Forest Service about these so called "developments". We have been deprived of our ability to participate meaningfully in this process because the Forest Service failed to notify the public of the proposed logging within roadless areas when they first issued the project documents last year (at a time when the area was accessible), and then again because the Forest Service decided to request further information from the public during a time when the area in question is closed to the public and covered in snow.

The fact that road construction/ re-construction will occur in the areas in question evidences the fact that the roads are not currently being utilized and are likely long unused (though we would need access to the area to confirm this) and therefore this justification for removing roadless designation is arbitrary. In addition, ingress into these areas will also likely lead to more and more incursions, breaking up these large tracks of undeveloped habitat. For, once an area is declared non-roadless, it no longer has roadless protections, which can result in negative cumulative effects on native species from additional logging and roading activities. The addition of roads in this area will also likely increase motorized human use of these areas, again negatively affecting native wildlife, including the Pacific Fisher, and causing chronic erosion into streams. Occurrences of Pacific Fisher road-kill deaths in roaded areas (Gaskill 2013, Litvaitis and Tash 2008) are a major cause of mortality for this species, which will drastically increase with roading activities.

Further, we would like to remind the Forest Service that the presence of some ancient, past use by man on a very small portion of a Roadless Area, or even more recent past human development on a small portion, has not been a disqualifying factor in Wilderness designation in the past. In fact the Wilderness Act makes clear that these areas need not be free of all imprint by man, but rather that they "*generally appear[s] to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable*". 16 U.S.C 1131 (c)(1) (emphasis added). In addition, there are numerous examples of Forest Service Wilderness areas that have boundaries close to roads, immediately adjacent to roads, and/or within earshot of human activities including: the San Gabriel Wilderness Area (Angeles National Forest) where Highway 2 serves as its northeastern and the southwestern boundaries (abutting the boundary in some areas and within 100-200 feet in others); Sheep Mountain Wilderness Area (Angeles National Forest) contains four private inholdings and Highway 2 forms its northern boundary and Forest Service Road 3N39 goes directly to the Wilderness area; and the Desolation Wilderness (El Dorado National Forest) which rises vertically just north of Highway 50, and nearly abuts Highway 89 on its eastern boundary. All of these Wilderness areas are affected by human activity, much more than the roadless areas at issue in the French project area, and therefore the Forest Service's stated justifications for failing to analyze the loss of roadless/wilderness values in this instance is not reasonable.

Given the rarity and importance of unroaded wild areas for human enjoyment and wildlife preservation, it is incumbent upon the Forest Service to prepare an Environmental Impact Statement, with a full range of alternatives, allowing ample unencumbered access to these areas to the public during the comment period, in order to fully assess the impacts from intensively logging (including clearcutting) live and dead trees in these Roadless Areas, and building roads, through the French Logging Project. This is especially true here, given that the Sierra National Forest is one of the only places where three imperiled California native species (all petitioned for listing as threatened or endangered under the Federal Endangered Species Act, and all with positive 90 day findings from US Fish and Wildlife Service) --the California Spotted Owl, the Black-backed Woodpecker and the Pacific Fisher--all presently reside and will all adversely be affected by the proposed logging. Alternatively, the Forest Service could modify its Finding of No Significant Impact to eliminate any logging within these Roadless Areas.

Sincerely,

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