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Sent to:
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**cc: Ara Marderosian
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Carla Cloer, Dr. Chad Hanson
Kevin Elliott**

Subject: Hume District Roadside and Recreation Site Hazard Tree Project PEA Comments for Sequoia ForestKeeper & 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 comment on the Preliminary Environmental Assessment (PEA).

Introduction and Summary of Comments

SFK and the Club suggest that the only action alternative the Forest Service can select, which addresses all of the issues raised and which complies with the GSNM Proclamation's stricture on tree removal, is Alternative C, the fell and mitigate alternative. There can be no justification for removing the trees once felled because they no longer pose a safety hazard. Moreover, there can be no justification to remove the felled trees given the fact that the project area, on average, does not yet meet the minimum requirement for large down logs, according to the Forest Service own data and analysis. Even if a localized area might already meet the 10-20 tons/acre of large down logs (12 inches in diameter at center), that material must be relocated where the requirement has not been met before removal of trees from the Monument can be. Native insects and diseases, including those mentioned in the PEA, are essential components of the Monument's ecology as explicitly mentioned in the Monument Proclamation. Moreover, treating trees stumps and boles with borax will mitigate any concerns the Forest Service may have about vectors of disease caused by fungi and will address concerns about resiliency. For those reasons, choosing any of the action alternatives that would remove trees from the Monument would violate the Proclamation and the new GSNM Plan requirements to retain large downed logs to meet the needs of wildlife.

SFK and the Club support averting hazards in the additional recreation and permit sites that have been added to the project, in which hazard trees would be felled and relocated from these sites under Alternative C. We do not object to allowing these felled trees to be used by personal wood cutters, but this should only be allowed in recreation or permit sites and only where the minimum large down log requirement has been met. In other areas where the 10-20 tons/acre of large down logs has not been met, the Forest Service should prohibit removal of down logs for personal firewood use as inconsistent with the GSNM Plan's standards and guidelines.

Given the fact that the Chief of the Forest Service has issued an Appeal Decision for the Monument Management Plan that directly conflicts with the removal criterion and standard and guideline for hazard trees to be used in this decision and analyzed in the PEA, and the fact that the District plans to re-survey the project area to identify additional trees for felling, the Forest Service must provide for an additional EA comment period once the Monument Management Plan appeal issue is resolved and new data on additional trees to be felled is available. Otherwise the Forest Service risks a violation of NEPA.

We would also like to refer the Forest Service to our extensive scoping comments for issues that we have not reiterated and which have not been addressed in the PEA, and we incorporate those comments herein by reference.

Finally, we would like to commend the Forest Service for developing Alternative C and also for providing a more accurate picture about the socioeconomic conditions and the issue of “trust,” as expressed in the Socioeconomics Report, pp. 11-14. An ongoing significant issue in this project is trust, given the continued bias we perceive from the Forest Service to remove trees when it is clearly unnecessary and inconsistent with the letter and intent of the Monument Proclamation. Our level of trust with the staff of the Hume Lake Ranger District has improved, given the recent decision and plans to implement the Boulder Burn restoration project with minimal tree felling. We hope to be able to build on that trust. Selection of Alternative C will go a long way in addressing our trust issues, whereas selection of an alternative that unnecessarily removes many very large trees from the Monument when data and ecological conditions suggest that they should be left would again erode that trust and create unnecessary conflict.

Detailed Comments

1. A new EA comment period will be necessary.

NEPA regulations “require that the public be given as much environmental information as is practicable, prior to completion of the EA, so that the public has a sufficient basis to address those subject areas that the agency must consider in preparing the EA.” *Sierra Nevada Forest Protection Campaign v. Weingardt*, 376 F.Supp. 2d 984, 991 (E.D. Cal. 2005). The regulations require that “a sufficient amount of environmental information—as much as practicable—be provided so that a member of the public can weigh in on the significant decisions that the agency will make in preparing the EA.” *Id.* Moreover, “the Ninth Circuit has held that the CEQ regulations require the agency to give the public adequate information to comment on projects.” *Id.* (citing *Citizens for Better Forestry v. United States Dep't of Agric.*, 341 F.3d 961, 970 (9th Cir. 2005)).

Because it is practicable to provide additional information that is highly relevant to this decision in the form of a clarified criterion for determining whether roadside hazard trees can be removed and because the public does not yet have any environmental information about the scope and details of additional trees that may be proposed for felling, it is necessary to open the EA comment period again when that information can be presented to the public.

- a. The Chief's GSNM Appeal Decision will result in either changes to the Removal Criterion or a change in S&Gs, so a new comment period is necessary.

The Chief's recent Appeal Decision, affirming the GSNM Plan with instructions, includes a directive to revise the plan with regard to the Standard and Guideline that relates to hazard tree removal along roads (#4) and the "clearly needed" criterion for removal of trees along roads. See Exhibit A.

As we have stated in our appeal and in previous comments on the GSNM Plan DEIS, there is no removal criterion that can be justified for safety once a tree has been felled along a road. We have also objected to the criterion for removal of felled trees in recreation sites. Felled trees are no more hazardous as an attractive nuisance than live trees, neither of which creates an unusual safety risk. There is an abundance of large trees that have fallen in the Monument and the adjacent Sequoia and Kings Canyon National Parks, including very large giant sequoias in popular recreation sites. Recently, two large giant sequoias fell along the Trail of 100 Giants, and the issue of safety with respect to these large trees did not become an issue. We believe that the criterion based on attractive nuisance is fallacious and has little support or justification. The only hazard we can imagine is one that would be created by the Forest Service itself, if it were to pile hazard trees as it has done in the past piles or in a log deck, which may in the future move or roll to cause a hazard if climbed upon. See e.g. Exhibit D (current photograph of piled hazard trees left along a road in the Hume District). Leaving these hazards of log decks or piles is completely unnecessary and can only be considered a hazard created by the Forest Service.

Once the Forest Service identifies a possible resolution to the issue from the Appeal Decision, which itself should receive public scoping and comment, a new EA comment period must be initiated. The issue identified by the Chief goes to the heart of the letter and intent of the Monument Proclamation's stricture on tree removal, and because hazard trees are the largest trees that could potentially be removed from the Monument, it is highly relevant to any decision that would be made for this project. According to the datasheets in Appendix E of the PEA, these trees average in size well over 30 inches dbh, and some are even larger than 60 inches dbh. To apply a new criterion or S&G without any public input would violate NEPA.

- b. Additional surveys for new hazard trees have yet to be completed in 2013 along roads and in recreation or permit sites, and the analysis and data compilation has not yet been completed.

Because not all hazard trees have been identified and because the existing data sheets for already-identified trees must be updated, the scope of the analysis is unclear. Therefore the Forest Service should provide another EA comment period once it can adequately present this new environmental information. In addition, the existing data in Appendix E is incomplete, according to the R5 Hazard Tree Guidelines and must still be updated and correctly interpreted.¹

¹ We would like to point out that the R5 Hazard Tree Guidelines define which trees can be felled and potentially removed from the Monument, although these guidelines did not go through a formal NEPA process and were not provided during the Monument Management Planning process. This is especially disturbing since these guidelines were developed primarily for non-

2. Provide additional details about tree locations and conditions in the EA.

a. Include the tree locations maps in the EA.

After our 2012 field trip, the district provided us with detailed maps of the various tree locations by number. *See* Exhibit B. We urge the Forest Service to include these maps, including an update of the maps after the 2013 survey, as an appendix to the EA. The location of trees is highly relevant to the issue of retaining trees locally where the large down log requirement has not yet been met.

b. Provide completed and updated R5 Hazard Tree Inspection Forms that are readable.

To be useful and to meet the R5 Hazard Tree Guidelines, the R5 Hazard Tree Inspection Forms must be complete and readable. The current state of the forms in Appendix E of the PEA are neither complete and do not include all the information required in the R5 Guidelines, nor are they even reasonably readable. For example, the defect descriptions are not only unreadable but there is no explanation provided for what the defect abbreviations mean. We suggest that these forms can only be made readable if the data is entered into a table or spreadsheet of some sort. Hand-written data is not acceptable or readable. At the same time, the district should use the updated forms in Appendix A of the 2012 R5 Guidelines. Moreover, any missing data must be gathered and input into the forms, including location, defect, failure potential rating, failure impact rating, and recommended ED action.

There appear to be two sets of partially completed hazard tree inspection forms without any explanation how they are different or similar. Please either explain why there need to be 2 sets of forms or provide only 1 set of completed forms in the next version of the EA.

As far as the hazard rating scores go, there are many instances where the numbers don't add up. A common occurrence is that the failure potential rating (A) is 2, the failure impact rating (B) is 3, but the hazard rating score (A+B) is sometimes 5 and other times is 6. Please explain these fundamental inconsistencies or correct them. These differences are significant because the recommended actions from the R5 Guidelines change from "4-5 = tag/record/map tree, monitor or mitigate" to "6-7 = immediate mitigation." A difference between a total hazard tree rating of 5 and 6 will determine whether a tree should stand or be felled. Any decision to fell a tree should not be taken lightly, given the strictures in the Monument Proclamation and GSNM Plan.

Finally, the new R5 Guidelines provide a multitude of recommendations short of tree felling (or removal) that should be considered as recommended actions. In the past, these recommended actions have rarely been applied, and we insist that they be considered, otherwise they have not meaning. *See* R5 Guidelines, pp. 20-22. These include:

Monument areas and are being applied to the Monument. The R5 guidelines include provisions that directly contradict those in the Monument Proclamation, which prohibits tree felling and removal, unless clearly needed for ecological restoration and maintenance or public safety.

- Target removal (certain roads could be considered for closure to public use)
- Topping (for trees with 50% or less dead crowns)
- Pruning (as appropriate)
- Specialized action for larger trees (see guidelines)

The district must give meaning to these considerations and not just implement the single solution of tree felling, which it has done in the past.

3. Removal for ecological restoration or resiliency has no scientific basis.
 - a. The alleged basis for a potential increase in insects and disease from leaving felled trees is arbitrary and unsupported by scientific evidence.

In support of Alternatives B & D, the Forest Service suggests that leaving felled trees will provide a vector for an increase in insects and disease. *See* PEA, Appx. A (“The trees identified as falling dangers to people are dead or dying and, if left on the ground as down wood, would continue to provide a vector for insects (current infestation of bark beetles) and disease (annosum). It is expected that removing portions of these trees would make these forest stands more resilient to these and other forest stressors.”).

However, in his review of the PEA, forest ecologist Dr. Chad Hanson observes:

In the course of attempting to justify removal of felled hazard trees, the PEA, Appendix A (p. A-2) makes several erroneous and irrational statements that are directly contradicted by the scientific evidence, as well as by the PEA itself.... [T]he PEA (p. A-2) claims that felled trees would be vectors for annosus root disease. However, the PEA (p. 16) clearly states that stumps would be treated with a borax-based fungicide, which eliminates this problem. There is simply no reason whatsoever that the butt of the log could not also be treated with the fungicide. [] [T]he PEA (p. A-2) claims that downed logs could be used by bark beetles. However, the PEA fails to mention that these beetles are native species in the Giant Sequoia National Monument, and are essential prey of many woodpecker species native to the Monument. Moreover, bark beetles are associated with standing dead trees, not downed logs.

Exhibit C – Comments by Dr. Chad Hanson, p. 2.

The Monument Proclamation, in fact, emphasizes the need to retain native insects and diseases and even includes them as objects of interest: “This spectrum of interconnected vegetation types provides essential habitat for wildlife, ranging from large, charismatic animals to less visible and less familiar forms of life, such as fungi and insects.” Because the native insects and diseases are inherent to the processes that maintain the ecology of the Monument, their suppression for the sake of resiliency could not be a legitimate reason to remove these trees.

- b. There is no basis for assertions of preventing wildlife hiding cover.

Dr. Hanson also states that

the PEA (p. A-2) claims that removing the logs would “prevent...hiding cover for wildlife”. I am not aware of any legitimate ecological goal which seeks to reduce wildlife habitat. Moreover, nothing in the way of evidence is offered in the PEA to support this bizarre statement, and the statement would be equally true applied to standing, non-hazard old-growth trees near roads, or to existing downed logs, yet the agency is not proposing to remove these trees, which also provide cover for wildlife.

Exhibit C – Comments by Dr. Chad Hanson, p. 2.

The Monument Proclamation, in fact, emphasizes the need to maintain “habitat for wildlife” and even includes it as an object of interest: “This spectrum of interconnected vegetation types provides essential habitat for wildlife, ranging from large, charismatic animals to less visible and less familiar forms of life, such as fungi and insects.”

c. The need for more large down logs in the project area.

Dr. Hanson also explains why we need additional large down logs in the project area:

The PEA (pp. 29-30) states that there are currently 7.68 tons per acre of large downed logs in the project area, which is less than the 10-20 tons per acre required by the standards from the 2001 Sierra Nevada Forest Plan Amendment (incorporated into the Giant Sequoia National Monument Management Plan) in order to adequately provide habitat for the many wildlife species that depend upon large downed logs, including small mammals, amphibians and reptiles. Leaving felled hazard trees on the ground for wildlife habitat would bring the currently deficient levels of large downed logs much closer to the minimums prescribed in order to maintain healthy wildlife habitat, and would likely bring the levels to 10 tons per acre or above in some locations.

A particular concern of mine with regard to the Forest Service’s proposal to remove larger, felled hazard trees is the adverse impacts on the prey base of the Pacific fisher, an extremely rare and imperiled mink-like forest mammal strongly associated with mature/old-growth forests and the habitat structures inherent in such forests, including downed logs. The fisher is a Forest Service Sensitive Species, and is a Candidate Species for listing under the federal Endangered Species Act. The Final Environmental Impact Statement for the 2001 Sierra Nevada Forest Plan Amendment (Vol. 3, Chpt. 3, part 4.4, pp. 2-3) states that 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, the felled hazard trees in the Hume project area would substantially 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.

Exhibit C – Comments by Dr. Chad Hanson, p. 2.

4. Resiliency cannot be a justification to remove trees.

The sole reason used to justify the removal of tree boles after they have been felled is the GSNM Plan criterion for resiliency. The “Tree Removal” criterion for resiliency allows removal “If keeping one or more trees on site would provide a vector for insect or disease infestations at levels higher than currently known endemic levels.” PEA, Appx. A, p. A-4. Given the various factors at play in the project area, there is legitimate basis to suggest that leaving the trees identified for felling in this particular project area as proposed in Alternative C will result in high-than-normal endemic insect and disease levels.

First, since hazard trees are scattered around the project area or in small groups, the resiliency determination must be made at the individual tree or group of tree level rather than for the project as a whole. No such determination has been made and would have no legitimate basis. Second, mitigation by treating stumps and boles with borax will keep the spread of annosus root disease in check, resulting maintaining resiliency and averting high-than-normal disease levels from fungi. Third, there is no evidence provided that leaving individual trees or even groups of trees will increase insect levels at high-than-normal levels. In fact, Dr. Hanson states that the beetles the Forest Service suggests will attack these felled trees are only associated with standing trees. Fourth, the large down woody material shortage in the project area suggests that the forest ecosystem can handle the additional levels of logs, contradicting the need to remove trees for resiliency. Finally, there is no data provided that insect or disease levels are higher than normal or would be higher than normal if felled trees are left. Snag levels are not unusually high; in fact, they may be lower than required by the plan.

There is currently a pervasive deficiency of large snags in California’s forests, with less than 2 large snags per acre presently existing in every region, on average, including in the Sequoia and Sierra National Forests, according to a comprehensive analysis conducted by Forest Service scientists in a recently-released report (Christensen et al. 2008). This report also warned about the threat posed to the ecological health of California’s forests by this large snag deficiency, pointing out that current levels may not be sufficient to support populations of numerous wildlife species (Christensen et al. 2008).

5. As objects of interest, native insects and fungi must be retained and not surpassed, and therefore the Criterion for Resiliency in the GSNM Plan and as applied to this project is inconsistent with the Monument Proclamation.

Native insects in the forest ecosystem provide an essential natural ecological process and are to be retained and maintained, in accordance with the Monument Proclamation. So projects in the Monument, such as this one, should not suppress native insects that are endemic to the forest ecosystem, even for the sake of resiliency. Similarly, native fungi in the forest ecosystem provide an essential natural ecological process that should be retained and maintained, as pointed out explicitly in the Monument Proclamation: “This spectrum of interconnected vegetation types provides essential habitat for wildlife, ranging from large, charismatic animals to less visible and less familiar forms of life, such as fungi and insects.”

For this reason, we reject the criterion that would allow removal for resiliency when native insects and fungi are concerned, such as in this project. Because it is inconsistent with the Monument Proclamation, the resiliency criterion cannot be used as a basis for removal of hazard trees for this project. Here, there is simply no ecological basis for removal of hazard trees, and no safety basis for removal once the hazard trees have been felled.

6. On average, the project area is not likely to meet the GSNM Plan down woody material standards, even after felling and well into the future.

The Giant Sequoia National Monument (GSNM) Plan requires that projects “[r]etain felled trees on the ground, where needed, to achieve down woody material standards of 10 to 20 tons per acre in logs greater than 12 inches diameter at midpoint.” GSNM Plan, p. 85, Item 9. However, the current average in the project area is only 7.68 tons/acre on average. See PEA, Table 3, p. 30.

A rough and simple calculation shows how leaving felled trees in the project area will only nominally increase the average tonnage of large down logs per acre, well short of the minimum required:

Brown et al. 2003, provided during scoping, includes Table 2, which gives a rough guideline for the weight of trees by diameter. That table, however, stops at 30 inches dbh. A 30 inch dbh tree, according to Brown et al. 2003, weighs between 3.3 and 3.8 tons. The average tree size of the 250 hazard trees identified in this project, however, is likely to be larger and in the order of 36 inches, dbh. Using Brown as a rough guide and for purposes of illustration, we will assume that an average tree of 36 inches dbh would weigh about 5 tons. Therefore, the estimated total addition to the large down wood tonnage in the project area would be about 1,250 tons (= 250 trees x 5 tons/tree).

The project area consists of 2650 acres along roads, and therefore the total additional tonnage per acre would be about 0.47 tons/acre (= 1,250 ton / 2650 acres).

Adding the 0.47 tons/acre to the current estimate of 7.68 ton/acre, the total estimated average of large down logs would come to 8.15 tons/acre, well short of the 10-20 tons per acre required under the plan.

To reach the minimum of 10 tons/acre, the Forest Service would have to add a total of 2.32 tons/acre of large down logs (= 10 ton/acre – 7.68 tons/acre). If the average size tree weighs 5

tons, that would require the addition of roughly 1,230 average sized trees (= (2.32 tons/acre x 2650 acres) / 5 ton/tree)). That number represents roughly five times the density of average trees that could be felled as hazards just to reach the minimum 10 tons/acre in the plan requirement.

Given that the tonnage of large downed logs is a range and the minimum can be up to 20 tons/acre, it will likely take decades to reach the necessary minimums even if all felled hazard trees are left along these roads for the foreseeable future.

Even if there are localized spots where a minimum of 10-20 tons/acre may be attained by leaving the felled trees, the great deficit in large down logs in other areas along roads counsels that any localized surplus be located in areas along roads where the deficit is particularly great. This means that all felled trees should be retained in the project area along roads for the purpose of adding to need for the large down logs, as required by the GSNM Plan.

7. The EA should calculate the actual amount of large down woody material after project implementation.

Instead of using our rough estimate, the Forest Service should provide calculations using the actual data and weight for each tree, since this data is highly relevant to the decision to either remove or retain felled tree boles. This should be possible since the dbh, height, and species of tree are provided in the hazard tree inspection forms.

We urge the Forest Service to:

- a. Calculate the average large down material tonnage if all hazard tree boles are felled and left – adding to the current average of 7.68 tons/acre as reported in the PEA.
- b. Provide data or calculate estimates of current localized tonnage of downed logs in areas where trees are planned for felling.
- c. Determine how many tons of large trees boles are needed to meet the 10-20 tons/acre standard, on average and in localized areas where trees are planned for felling.

In making these calculations, please explain how you derived the results and how you determined the weight in tons based on tree diameter, height, and species. Also, we urge you to provide the size and weight of the average hazard tree in the list, and calculate how many average-sized it would take to get the entire project area up to the minimum 10-20 tons/acre as required by the GSNM plan standard.

8. Fuelwood cutting and removal should be prohibited in areas along roads where the minimum large down log levels of 10-20 tons/acre have not been met.

Given the plan standard that requires a minimum level of large down logs for wildlife and soils, it would be irresponsible to fell and leave hazard trees and then immediately allow their removal for personal firewood cutters. Fuelwood removal in areas that do not yet meet the large down log requirements should be prohibited until the forest can assure that 10-20 tons/acre would be left, even after fuelwood removal.

9. Alternative B & D provide insufficient information about which trees would be left to meet the large down log requirements or where trees would be removed.

For both Alternatives B & D, the PEA states that trees would be removed from the monument. But it also states that “[a] portion of the downed trees would be left on site to ensure the dead and down woody material requirements for wildlife and soil quality are maintained.” Given the fact that the PEA acknowledges that the project area, as a whole and on average, only has 7.68 tons/acre of large down logs and, on average, does not yet approach the 10-20 tons/acre minimum, how can this contradiction be explained and how can any removal be justified? According to district staff, trees would only be removed in areas where there are enough large down logs to meet the forest plan standard; however, these areas have not been identified nor has the district disclosed which of the 251 trees would potentially be removed and which would be left. And according to the criterion for removal, this determination must be made on a single tree or group of tree basis.

So the PEA must provide sufficient information to justify the removal of any single tree or groups of trees and thus must provide the data for which treatment areas already meet the minimum standard or which areas do not. Given the detail provided in the hazard tree location map (Exhibit B), it should be possible to provide the down woody material tonnage data at the locations where trees are proposed for felling and/or removal. Without that site-specific data, removal of trees would not follow any protocol or meet the rigors of the existing criterion, and their removal would therefore be done arbitrarily. Moreover, because this information is critical to the decision, NEPA requires that this information be available to the public and decision makers before the decision is made.

Also, given the default basis that there is insufficient tonnage of large down woody material, on average, across the project area, the practical effects of the Alternatives B & D after implementation, which must leave most if not all logs to meet the 10-20 tons/acre material standard, are no different than Alternative C, unless localized data is provided to the decision-maker as a part of the EA.

10. Data on Large Snag Density has not been provided and is relevant to ecological health as well as the justification to remove felled trees for resiliency.

In our scoping comments, we requested that the district provide data on existing snag levels in and around the project area. Large snag density is an important factor in retaining and maintaining wildlife habitat, especially for sensitive wildlife species in the project area, including Pacific fishers, California spotted owls, and northern goshawks.

If there is in fact a deficit of large snags locally in and around the project area, this is relevant to the ecological health and basis for removal of felled trees for several reasons. First, felling snags will reduce the average snag density in and around the project area, as acknowledged in the PEA’s biological assessment. This is an adverse effect on sensitive wildlife, which can be partially mitigated by leaving these felled snags as large down logs because these same species need large down log habitat to ensure an adequate prey base. This is especially important because the current average large down log levels (at 7.68 tons/acre) do not meet the minimum

requirements for wildlife as stated in the GSNM Plant (10-20 tons/acre). Second, even if these felled trees somehow contribute to an increase in future large snag recruitment because they provide vectors of insects and disease, this is likely to have a positive ecological effect, especially in areas where large snag densities are low or have been reduced by past and proposed hazard tree felling. A snag deficit, therefore, also suggests that the removal criterion for resiliency is ill-advised because it will contribute to a reduction in future snag recruitment.

For those reasons, the EA must provide localized data on snag densities to justify any decision.

11. Project cost and the value of the trees for sale cannot be used to justify selection of one alternative over another.

The Monument Proclamation does not allow economics or costs as factors in the “clearly-needed” determination for removal, which can only be made based on the strictures in the Proclamation, which are limited to a determination that tree removal is clearly needed for ecological restoration and maintenance or public safety. And while the presentations of total project costs, stumpage values of trees that could potentially be removed under the removal alternatives, cost/benefit analyses, and societal (economic) benefits, as expressed in Appendix A of the Socioeconomic Report, are interesting, none of these factors can be used in support of selecting one alternative over another.

The decision to favor retaining trees in the Monument has already been made by the President when he issued his Proclamation, which states that “No portion of the monument shall be considered to be suited for timber production” and “Removal of trees, except for personal use fuel wood, from within the monument area may take place only if clearly needed for ecological restoration and maintenance or public safety.” And even though total project costs are roughly comparable between Alternatives C & D, any decision to select one alternative on this basis or any economic basis would be prohibited.

12. Appendix A of the Socioeconomics Report suggests that the net costs of Alternative C and D are roughly the same, and the statements in the body of the report and in Table 1 appear to be incorrect or inconsistent with Appendix A.

There is inconsistency between the data in Table 1 of the Socioeconomics Report and the data with respect to costs, as provided in Appendix A of the report. Where Table 1 suggests higher total costs for Alternative C relative to Alternative D, Appendix A shows lower total costs for Alternative C relative to Alternative D.

TOTAL COSTS	Alternative C (fell & leave)	Alternative D (fell & remove)
Table 1, p. 16	\$256,607	\$219,590
Appendix A, p. 22	\$353,942	\$398,453

This must be reconciled. In comparing line items, it appears that the Contract Preparation costs for Alternative C in Table 1 are stated at \$105,000, whereas the same cost in Appendix A is only \$52,525. This may explain the majority of the discrepancy, although the discrepancy between

the Sale/Contract Administration line item for Alternative C are also significantly different between Table 1 (\$41,900) and Appendix A (\$11,694).

Assuming the figures in Appendix A are correct (which appear more precise), even if the total stumpage value were subtracted from the total costs for Alt. D (which seems high, given the need retain large down logs), the overall net project costs of both Alternatives C & D are roughly comparable:

NET COSTS	Alternative C (fell & leave)	Alternative D (fell & remove)
Total Cost	\$353,942	\$398,453
Less Stumpage Value	-\$0	-\$53,824
	\$353,942	\$344,629
Also compare:		
PNV (not including Watershed, Wildlife, Fuels/Fire, or Recreational Benefits)	-\$323,382	-\$314,069

And given the requirement to retain many of the large tree boles as large down logs for wildlife and the rough comparability of costs between the two alternatives, there is no basis to prefer a tree removal alternative for the purpose of reducing costs of implementing the project.

Summary

Again, based on the foregoing reasons, we urge the Forest Service to select Alternative C with restrictions on personal firewood cutting in areas where minimum down log levels have not yet been achieved. Selecting an alternative that would remove trees from the Monument in this project would violate the Monument Proclamation and the GSNM Plan.

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



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