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**PROTECTING  
NATURAL  
RESOURCES**

December 23, 2020

**Submitted to: comments-pacificsouthwest-sequoia@usda.gov**

Teresa Benson – Sequoia Forest Supervisor  
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Sequoia National Forest/Giant Sequoia National Monument  
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cc: Ara Marderosian  
Matt Kenna, Attorney  
Stephen Montgomery  
Alison Sheehey  
Eric La Price

**Subject: Supplemental Scoping Comments re: Castle Fire Roadside and Recreation Site Hazard Tree Project**

Sequoia ForestKeeper (SFK) and the Kern-Kaweah Chapter of the Sierra Club (SC) ask you to consider the following as a supplement to our comments, submitted on November 25, 2020.

### Green/Scorched Tree Survival

Scientific evidence shows that trees, especially pines, can survive even if 100% of the foliage is burned, and that many scorched trees will flush the next year and survive a fire. According to the Forest Service's own publication on the issue, this is likely to occur:

With growing debate over the impacts of post-fire salvage logging in conifer forests of the western USA, managers need accurate assessments of tree survival when significant proportions of the crown have been scorched. The accuracy of fire severity measurements will be affected if trees that initially appear to be fire-killed prove to be viable after longer observation. ... We found that, among ponderosa pines (*Pinus ponderosa* Dougl. ex. Laws) and Jeffrey pines (*Pinus jeffreyi* Grev.&Balf) with 100% initial crown scorch (no green foliage following the fire), the majority of mature trees flushed, and survived. Red fir (*Abies magnifica* A. Murr.) with high crown scorch (mean=90%) also flushed, and most large trees survived. Our results indicate that, if flushing is not taken into account, fire severity assessments will tend to overestimate mortality and post-fire salvage could remove many large trees that appear dead but are not.

See Forest Service Publication, available at <https://www.fs.usda.gov/treearch/pubs/36850> (see also Attachment A). Although not included in the study, there is some hope that burned giant sequoias may also flush in the upcoming season, recover, and survive.

This is particularly important in the Giant Sequoia National Monument where the protection of trees is a defining principle of the Monument proclamation. In fact, until the Forest Service has determined that the trees are actually dead, their removal is not “clearly needed ... for public safety”:

Any treatments that involve the removal of trees from within the Monument area, including both standing trees and downed logs, will only be permitted following a determination that removal of the trees is “clearly needed for ecological restoration and maintenance or public safety” (Clinton 2000, p. 24097).

GSNM Plan, p. 80 (quoting and citing to the Monument Proclamation).

So, the plan requires the Forest Service to wait and assure that, according to the science, these trees have not survived before they are felled and/or removed, since it is likely that many of them are not actually dead and will survive. The scientific findings in the cited paper above requires that the Forest Service make a determination after the growing season and on an individual tree basis before designating a tree as dead and/or a hazard. Without such a full analysis, the removal of these trees is not “clearly needed” and would violate the letter and intent of the Forest Plan and the Monument Proclamation.

Until then, the Forest Service can and should consider alternatives to tree felling to avert hazards, such as keeping the roads in the Castle/Sequoia Complex Fire area closed until completing the assessment and the analysis can adequately gauge whether some of the ancient pines, firs, and giant sequoias are actually dead or will survive. During this evaluation period and while the area is closed, there is no reason to fell most of the trees along roads and in recreation sites as hazards, unless they have clear structural defects or other physical indications that they have died, such as beetle infestations.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'René Voss', with a stylized flourish at the end.

René Voss – Attorney at Law