



19 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

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.

First, we must say that we the undersigned organizations would have absolutely no knowledge of the fact that logging was even scheduled to occur in roadless areas on the Sierra National Forest within the French fire project area, or that there was a "comment period" to address the issue, if we hadn't recently heard about this project secondhand. Upon hearing about this, we went in search of further documents. What we found on the Sierra National Forest website was nothing, absolutely no indication that logging in roadless areas was being proposed or that comments on this issue were being solicited. The Sierra National Forest Home Page makes no mention of this comment, period. Ex. 1 screenshot. There is also nothing related to this Wilderness Report comment period on the Alerts and Notices Page. Ex. 2. On the Project's page, the French Fire Recovery and Reforestation Project is listed as "Analysis Completed" (Ex.

3), and the description mentions nothing of roadless areas being logged. If you click on the title link (French Fire Recovery and Reforestation Project) it takes you to a page with no documents. Ex. 4. A general google search of the project name leads to the FS NEPA Information page for Sierra National Forest, French Fire Recovery and Reforestation Project, where again the description mentions nothing about logging in roadless areas, or this comment period for the so called Wilderness Report, and under Project Documents it plainly states "No documents are available for this project". Ex. 5. Additionally, the Schedule for Proposed Actions (SOPA) for October 2015 thru December 2015 lists the French Fire Recovery and Reforestation Project planning status as "Completed", and mentions nothing about roadless area logging, but does provide the location of the project. Ex. 6, p. 5. The January 2016 through March 31, 2016 SOPA does not even mention The French Fire Project, or any comment period. Ex. 7, pp. 2-9.

Given these facts, here are our comments.

1) Why didn't the Forest Service mention that the agency was authorizing logging in Roadless Areas in the initial Environmental Assessment last year? Why wasn't this specifically mentioned in any documents or notices about the French Fire Project? Roadless Areas are rare and important on the landscape, especially where rare and imperiled species are concerned, like the Pacific Fisher and California Spotted Owl, which both inhabit this area, and both use burned forest. There are very few Roadless Areas on this ranger district, and post-fire logging of live and dead trees and associated road construction/reconstruction would destroy the wilderness character of these areas and likely disqualify them from future Wilderness designation. These Roadless Areas may also connect to a currently designated Wilderness Area and are likely of great biological importance. This issue is of such importance, it should be discussed in one environmental document and that document should be an Environmental Impact Statement. In accordance with NEPA this hard look analysis should take place before any logging or ground disturbing activities begin. There needs to be a full consideration of alternatives and an admission that violating these Roadless Areas may significantly impact the environment.

2) As stated above, we heard about this proposed post-fire clear-cutting and road building project in these Roadless Areas secondhand. There is nothing listed about the proposal to log in these Roadless Areas, or this comment period, on the current Schedule of Proposed Actions or anywhere on the Sierra National Forest's website, nor are any project documents provided at the link to the French fire project on the Forest's website (the page is blank and contains no documents). How is the public supposed to meaningfully comment on this logging proposal when they are not even sure it is happening, and have not been given open access to key documents?

3). In addition, since comments are due next week, this comment period was apparently initiated in late December, and as such we have had no way of reviewing the Forest Service's assertions and justifications for roadless area logging. From the description of the project area on last quarter's SOPA, it appears that the road that allows the closest access (Minarets Road (FR) 81/Sierra Vista Scenic Byway (4S81)) to the Roadless Areas has been closed to the public for the duration of the comment period (Ex. 7) and, in addition, even if the road were open,

these areas have been covered in snow since mid-December. Combined, these two facts make it impossible for us to meaningfully comment on this project and present on-the-ground information to the Forest Service about the wild, roadless character of these areas, or to provide actual site evidence, which might inform the agency and alter this chosen course of action. From looking at maps and satellite imagery, there is no evidence of operational roads and other infrastructure in the Roadless Areas, but we can only support this impression by going out on the ground and reviewing these areas. Placing the comment deadline in the middle of winter, when access to the area and relevant information-gathering is impossible, and having no mention of this issue, or this comment period on your website, makes it seem as though you have no interest in actually receiving and considering meaningful public input, which is contrary to NEPA. We would love to provide the Forest Service with site specific information that would alter their current evaluation, but have not been provided the opportunity to do so, here.

4) Your proposed incursion into these Roadless Areas would eliminate important habitat, create fragmentation, and shrink a large continuous block of wild, undeveloped forest, all of which would have significant negative impacts to rare and imperiled species such as the California Spotted Owl, Black-backed Woodpecker, Pacific Fisher, Sierra Nevada Yellow-Legged Frog, and California Red-Legged Frog. Are these important issues specifically analyzed, with regard to loss of wild, roadless character, in the project documents?

5) Re-creating roads that nature has long ago reclaimed, and clear-cut logging large areas of the forest in these wild and primitive areas, would eliminate their wild character, disqualifying them from protection as future Wilderness areas. In addition, it would increase the chances that these new roads would be utilized by vehicles, including OHVs, increasing the likely damage to these areas from vehicle heat sources or tossed cigarettes on flammable grasses and leading to future cumulative impacts.

Sincerely,

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