

Comments on the Preliminary “Need for Change”

Submitted on behalf of the Tehipite Chapter of the Sierra Club

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To the Regional Planning Team:

The Tehipite Chapter of the Sierra Club thanks Region 5 of the U.S. Forest Service for this opportunity to comment. We have participated in every step of the process so far and appreciate the frank and open discussions led by Forest Service personnel during public meetings.

Statements that need clarification

The term “restoration” is used 110 times in the analysis, but not defined. The Forest Service seems to be proposing “restoration” (for example, salvage logging) that harms wildlife and important habitat. The analysis needs to be clearer on what restoration is and how loss in ecological value is justified by a “restoration” objective. The CFLRP defines “restoration” as “the process of assisting the recovery of resilience and adaptive capacity of ecosystems that have been degraded, damaged, or destroyed through human intervention by implementing ecological restoration treatments.”

How can we decide that there is a need to change, if we have not yet agreed on the desired conditions? The assessment does not describe well enough the difference between current condition and conditions that might be desirable. In many cases, we cannot tell why a need for change was identified since the change document has no direct link to the forest assessment.

Emphasis Areas that Are Missing and Need to be Included

Conservation of wildlife species at risk

This needs to be an emphasis area because so many species are negatively affected by management and human actions. The health and persistence of wildlife species are fundamental to providing for ecosystem health.

Each forest has a high number of species identified as at risk in the forest assessment (federally designated and potential species of concern). The Sierra National Forest assessment lists 93 species at risk. These species cover a variety of forest habitats and are threatened by numerous management activities. The plan needs to be designed to reverse the declines and eliminate threats to these species.

Designated Areas

Designations of new areas such as recommendations for wilderness, research natural areas, special interest areas and other special areas need to be made now in the forest planning process. The Planning Rule requires the Forest Service to assess the potential need and opportunity for additional designated areas, which then enables the Forest Service to designate additional areas as needed. If designations are not made now, management actions could degrade or destroy values. See the attached maps of areas Tehipite Chapter would like to see considered for designation as wilderness.

These include Devil's Gulch Potential Wilderness Area (PWA), Ansel Adams PWA, Raymond Mountain PWA, Shuteye PWA, Kaiser PWA, John Muir PWA, Dinkey Lakes PWA, Marble Point PWA, and Sycamore Springs PWA.

Roads and Infrastructure

Roads fundamentally affect ecological integrity of terrestrial and aquatic systems. The Planning Rule requires consideration of sustainable placement and management of infrastructure as well as requiring an outcome of sustainable access. Plan revision will not achieve this if infrastructure is not considered at a forest scale and as an emphasis area.

Protecting Unroaded Areas

Areas that are undisturbed by roads or have few roads are important to protect for watershed health and other habitat values. The forest plan needs to identify these areas and provide protection from road building and other actions that can harm their ecological values. (See attached maps.)

Areas Needing Change that are Not Clearly and Appropriately Stated in the Analysis

Forests

Salvage logging destroys important habitat. Direction is needed in the forest plan to protect this habitat. How does one decide how much salvage logging will be allowed? Tehipite Chapter endorses the following statement from Sierra Forest Legacy: "Post-fire logging disrupts natural ecological processes, threatens the habitat of wildlife species, and reduces water quality. Post-fire logging hinders forest regeneration and restoration by compacting soils, damaging riparian corridors, introducing and spreading invasive species, causing erosion, adding sediment to streams, degrading water quality, and removing trees utilized for habitat."

Fire is an essential process that shapes the landscape. The plans prevent us from using fire to manage the forest and other habitats. The plans need to be changed to promote the active use of managed fire. We need all types of fire – low, moderate and high severity. The forest plan prevents us from achieving this mix of fire effects that were part of the natural system. We must find a way to get more managed fire into the Sierra National Forest in a way that does not harm threatened species like the Pacific fisher, northern goshawk, spotted owl, and Yosemite toad, as well as the other 89 species listed as threatened in the assessment.

Logging of trees can remove habitat for at risk species. The forest plan needs to have clear direction on how to provide enough good habitat to make certain that imperiled wildlife can persist at multiple scales. Whatever logging is done must be done as part of forest restoration (see definition above).

I did not see the term "herbicide" used in the Assessment. In any case, the Forest Service uses herbicide (mostly glyphosate) in vegetation management. The use of herbicides removes important shrubs and understory plants from forested areas. The forest plan needs clearer direction on the conservation and management of these early seral conditions. Some current research suggests that herbicides may negatively impact forest soils, soil chemistry and soil ecology, negatively impacting invertebrates like earthworms. Glyphosate (Roundup) may bind essential trace minerals like manganese, magnesium, and copper so that plants can't use them. (See Don Huber, "Ag Chemical and Crop Nutrient Interactions," Green Pasture, <http://www.greenpasture.org/documentFiles/3.pdf>.) This research is new and has received little peer review. However, herbicides are not part of a natural forest regime; and introducing them into a natural ecosystem may have long term negative consequences. Therefore, we should follow the precautionary principle

and avoid using herbicides if there is alternative. Fire is such an alternative. Prescribed and managed fire and restoration of a natural fire regime will make use of such herbicides unnecessary.

Meadows and Riparian Areas

Roads and trails have negative impacts on stream condition (e.g., erosion, changing drainage patterns). The forest plan needs to provide clearer direction on when the negative effects of roads must be eliminated. If negative condition exists, roads and trails should be closed until the conditions are fixed.

Livestock grazing today has a negative impact on meadow systems. The plan needs to provide direction that stops the trampling of meadows, springs and seeps by cows. The plan needs to state that if grazing is not managed to avoid impacts, the cows must be removed. Perhaps a funding stream can be developed to help ranchers keep cattle out of sensitive areas. Such a subsidy would be worthwhile to preserve valuable riparian and meadow systems.

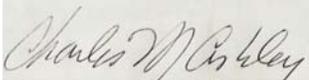
Livestock grazing damages woody shrubs in meadow systems. These shrubs are essential habitat for some birds, e.g., willow flycatcher. The plan needs to change so that livestock are not allowed to damage woody shrubs.

Great gray owls, a rare and at risk species, depend on trees in meadow margins for nesting and foraging habitat. Some approaches to meadow restoration focus on logging these trees. The forest plan needs clearer direction on how to protect these important habitat areas for great gray owls in places where logging is proposed.

Yosemite toad, an imperiled species, uses wet meadows and uplands for key parts of their life cycle. The forest plan needs to include standards to protect Yosemite toad from habitat loss and direct killing of toads due to grazing, road construction and other operations.

Dispersed recreation areas near streams and meadows can have negative impacts on these resources, e.g., trampling, loss of vegetation, streambank damage. The forest plan needs to have clearer direction about limiting this damage and shifting recreational use to other areas as a means of control.

Thank you,
Charles M. "Chip" Ashley



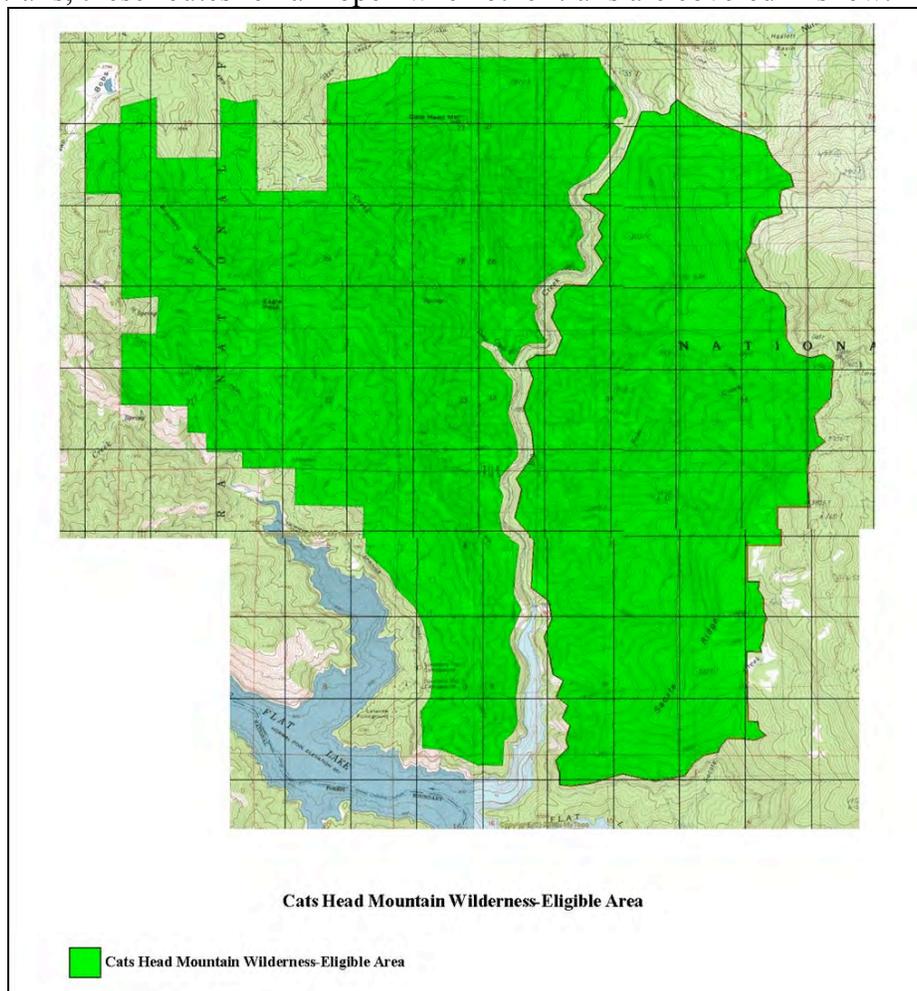
Secretary, Tehipite Chapter of the Sierra Club
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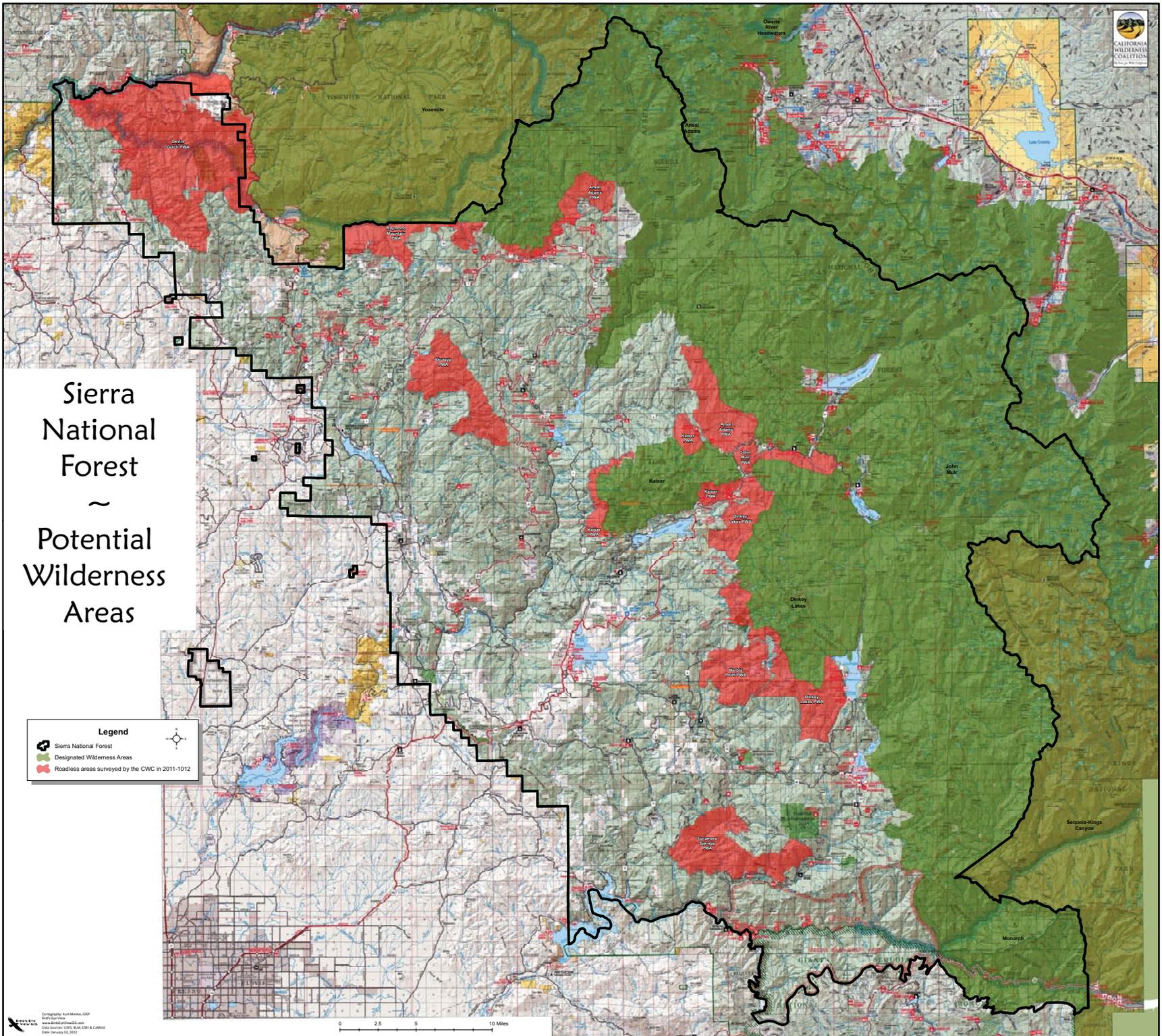
Attachment A: Citizen's Roadless Inventory for the Sierra National Forest.

Cats Head Mountain WEA

Size: ~10,456 acres in two units (0 IRA acres identified by the USFS during RARE and ~10,456 wilderness-eligible acres identified by conservationists)

Social and ecological values: This WEA was identified by staff and volunteers of the California Wilderness Coalition in 2001. The area consists of two units, one on the northern shore of Pine Flat Reservoir, west of Big Creek, and the second is east of Big Creek. The WEA is something that is quite rare in the Sierra Nevada: a low-elevation roadless area on public land. Most federal wild places are at mid to high-elevations because of the homesteading, logging, mining, and other development activities that removed low-elevation lands from the public domain. The WEA ranges in elevation from 3,460 feet atop Cats Head Mountain to 1,124 feet near Sycamore Creek. The area's rugged slopes are covered with oak woodlands, grasslands and chaparral, with small groves of cedar and ponderosa pine in shaded pockets. Given its low-elevation and plentiful forage, the area is important winter deer habitat. Deep Creek dominates the central portion of the area, and despite its seasonal nature, pools of water can be found in the canyon year-round. According to the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database (NDD), the following species of interest have been either recorded or have suitable habitat in the region: bald eagle, California condor, California spotted owl, Cooper's hawk, Farnsworth's jewel-flower, Pacific fisher, Fresno ceanothus, great gray owl, northern goshawk, osprey, prairie falcon, sharp-shinned hawk, streambank spring beauty, thread-leaved beakseed, western mastiff bat and western pond turtle. The WEA contains the popular Deep Creek Trail and Bobs Flat Trail. Unlike many of the SNF's trails, these routes remain open when other trails are covered in snow.





Sierra
National
Forest
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Potential
Wilderness
Areas

Legend

-  Sierra National Forest
-  Designated Wilderness Areas
-  Roadless areas surveyed by the CWC in 2011-2012

