COMPLEX EARLY SERAL HABITAT: POST FIRE HABITAT AND THE ROLE OF FIRE IN THE ECOSYSTEM

Primary Objectors:

Center for Biological Diversity and the John Muir Project, Earth Island Institute, **Justin Augustine**

Sierra Forest Legacy, **Craig Thomas and Michael Graf**

Interested Persons: Harold Singer, Heavenly Resorts

Summary: Objectors are concerned that extensive salvage and reforestation after wildfires would degrade or destroy complex early seral habitats important to many bird and mammal species which depend on snags and shrubs. Objectors have proposed changes to the LRMP including:

- Require maintenance of at least 4,000 acres of snag habitat at all times.
- Require retention of at least 90% of any moderate/high-severity burn areas outside the defense zone (excluding hazard trees)
- A limited operating period (LOP) to support black-backed woodpecker reproduction
- Revise SG 86 to prohibit redrawing or retiring PACs for 3 years following high- intensity burns
- Add a desired condition (DC), strategy, and objective to retain complex early seral in a relatively undisturbed condition

FEIS version:

- DC 56: *"The abundance, spatial distribution, and size and decay classes of both standing(snags) and CWD meet the habitat requirements of native species that utilize these structures"*

- Strategies pg. 58, first bullet: *"Manage snags and coarse woody debris for wildlife habitat as part of forest health or fuels reduction treatments as well as post-disturbance restoration."*

- OBJ 6: *"Create openings to shift approximately 50 acres of mid-seral white fir – mixed conifer type to early-seral each year between 2019 and 2029."*

- OBJ 9: *"Create approximately 40 acres of openings in the mid-seral stages to shift stands to early-seral Jeffrey pine each year between 2019 and 2029, and maintain it as the dominant species. Employ techniques to release early seral pine from competing vegetation if necessary. Post-disturbance event treatments will be used as opportunities to regenerate early seral Jeffrey pine. This objective may be accomplished in coordination with white fir – mixed conifer conversion objective, above."*

- OBJ 11: *"Create approximately 10 acres of openings in the mid-seral stages to shift stands to early-seral red fir type each year between 2019 and 2029. Utilize opportunities for treatment after disturbance events."*

- SG 28: *"After wildfires and other large-scale natural disturbances, take prompt measures to reduce adverse effects on public safety, water quality, scenic quality, recreation use, wildlife, and forest health. During the planning of postfire restoration projects, reduce forest fuels as needed to meet fuel loading and fire behavior guidelines to provide for public safety. Prioritize objectives and consider ecological restoration utilizing Standards 58 and 59 below. The cost of restoration may be offset by the sale of timber and biomass. [Guideline] "*

- SG 58: *"Postfire restoration projects (as planned using Guideline number 28 above) shall give priority to public safety and developed infrastructure first (e.g. hazard tree mitigation, WUI hazardous fuel reduction, flooding, roads, and trails, etc.) and then to wildlife habitat (including retention of burned forest habitat), soils, vegetation, water quality, and invasive species. [Standard]"*

- SG 59: *"Ensure that postfire restoration projects (as planned using Guideline number 28 above) include ecological restoration objectives based on needs of local wildlife species that use burned forest habitat. Include site-specific considerations such as burned forest habitat patch size and connectivity, snag spatial arrangement and density, range of snag sizes and densities, and focal placement of snags. [Standard]"*

- SG 86: *Maintain PACs and HRCAs that have been occupied by California spotted owl or northern goshawk within the last 10 years. However, after a stand-replacing event, evaluate habitat conditions within a 1.5 mile radius around the activity center to identify opportunities for re-mapping the PAC. If a California spotted owl PAC is remapped, the corresponding HRCA should be remapped within 1.5 miles of the remapped spotted owl PAC. If there is insufficient suitable habitat for designating a PAC within the 1.5 mile radius, the PAC and corresponding HRCA may be removed from the network. [Standard]*

Objectors' remedy:

- Add a standard that, within any 5-year period, at least 4,000 acres of suitable Black- backed Woodpecker habitat would be maintained on the LTBMU, through a combination of managed wildfire, mixed-intensity prescribed fire, and active snag creation. This does not mean that, within every 5-year period, 4,000 acres would have to experience near- complete tree mortality from fire; rather, it means that the Forest Service would not allow the amount of suitable Black-backed Woodpecker habitat on the LTBMU to sink below 4,000 acres in any 5-year period. Black-backeds can often use post-fire habitat of good quality for 10 years post-fire, and they also use areas of 40-50% tree mortality, if pre-fire basal area density is fairly high.
- ADD the Following new Standards and Guideline: *"Require retention, through a forest-wide standard (not a guideline), of at least 90% of any moderate/high-severity burn areas (except for*

public safety reasons—i.e., hazard trees that could hit public roads or buildings) which are created by fire, wildland or otherwise, outside of the Defense Zone, and retain the maximum possible amount of such habitat that can be retained in the Defense Zone while ensuring protection of homes."

- Include a standard for a limited operating period (LOP) for moderate and high severity burn areas which prohibits logging during the nesting season to protect the multitude of nesting birds, including Black-backed Woodpeckers and their offspring, until the chicks can survive independent of the parents (April through August).
- Revise SG 86: *" Maintain PACs and HRCAs that have been occupied by California spotted owl or northern goshawk within the last 10 years. Avoid re-drawing PACs or HRCAs to exclude high intensity burns and do not "retire" PACs until and unless at least three years of surveys to protocol confirm non-occupancy. [Standard]"*

Previous Forest Service Instruction:

- SG 37 G38. Retain current late seral-closed canopy (greater than 50 percent canopy closure) stands and when considering thinning of these stands, retain this seral stage as closed canopy outside of the WUI. Within the WUI, retain this seral stage as closed canopy if fire behavior objectives can be met. [Standard]

  Change to: Retain current late seral-closed canopy (greater than 50 percent canopy closure) stands and when considering thinning of these stands, retain this seral stage as closed canopy outside of the WUI Defense. Do not reduce canopy cover by more than 10%. Within the WUI Defense, retain this seral stage as closed canopy if fire behavior objectives can be met. [Standard]

Proposed revised Forest Service instruction:

- Revise Objectives for creation of early seral (Obj. 6, 9, 11) to clarify that areas disturbed by wildfire, insects, or disease would be utilized to meet these objectives when available. Cutting trees is not the only means for achieving these Objectives.
- Add/revise the following plan components:
  - DC XX. Complex early seral habitat created as the result of a disturbance (e.g., burned forest habitat) contains dense patches of pre-disturbance residual habitat elements (e.g., snags) and habitat elements characteristic of natural seral progression (e.g., regenerating shrub cover and herbaceous understory) that are important to early forest-associated species.
  - Strategy XX. Retain connected patches of complex early seral habitat (e.g., burned forest habitat) with minimal management actions where retention would not conflict with public health and safety.

- Revise Standard 59. Ensure that post fire restoration projects (as planned using Guidelines number 28 above) include ecological restoration objectives based on needs of local wildlife species that use burned forest habitat. Retain with minimal intervention, connected patches of this habitat type that have residual habitat elements important to species associated with burned forest habitat (i.e., complex early seral). Where management intervention is necessary, restoration project objectives for wildlife will prioritize the retention of existing dense and connected patches of snags that contain a range of snag sizes and spatial arrangements, and the retention of regenerating vegetation such as the shrub layer and herbaceous understory.