CENTER *for* BIOLOGICAL DIVERSITY

THE JOHN MUIR PROJECT of EARTH ISLAND INSTITUTE

March 20, 2015

Eldorado National Forest
Attn: King Fire Project
FS-comments-pacificsouthwest-eldorado@fs.fed.us

Re: King Fire Project

Dear Supervisor Crabtree:

On behalf of the John Muir Project of Earth Island Institute (JMP) and the Center for Biological Diversity (CBD), we are submitting these additional comments as to the proposed King Fire Project.

We were recently notified that the following alternatives are likely to be considered for the King Fire Project:

- Alternative 1 - No Action - 0 acres
- Alternative 2 - Proposed Action - 17,227 acres
- Alternative 3 - 13,549 acres
- Alternative 4 - 22,097 acres
- Alternative 5 - 17,227 acres with reduced herbicide

We have several important concerns with this list of alternatives. Most significantly, it is critical both for decision-making and informed public participation to examine an alternative that allows for public safety objectives to be met regarding hazard tree felling along roads (and hazard tree felling or removal where necessary to protect human structures in the small Wildland-Urban Interface area in the southeastern-most corner of the King fire area), but also allows for wildlife conservation to be otherwise prioritized. The no action alternative does not achieve that outcome, nor do any of the proposed action alternatives because they allow, at minimum, 30% of a rare and essential habitat type – complex early seral forest (CESF) – to be logged. Moreover, in addition to allowing for hazard tree felling, a conservation-based alternative could also allow for other actions, such as road decommissioning.

A conservation-based alternative is especially important because of the general perception in the public that fire only harms the forest. In other words, although it is now well established in the scientific literature that fire, especially severe fire, is essential for wildlife habitat in the Sierras (as discussed in greater detail in our initial scoping comments), the general media portrays forest fire as largely a negative outcome. A conservation-based alternative would allow to the public to learn why leaving the CESF unlogged would enhance the forest ecologically, which in turn might lead more of the public to support such an outcome. In short, a conservation-based

alternative would provide an essential educational tool, and yet it would also allow the Forest Service to explain to, and assure, the public that their safety concerns would be met along roads and human structures. In addition, because significant amounts of plantation forests were burned by the King Fire, a conservation-based alternative could explain to the public that some forest would be logged that is not CESF, thus addressing the economic objectives of the proposed project.

Only by analyzing at least one additional alternative that entirely, or nearly entirely, eliminates the logging of CESF, other than for hazard tree felling, will the public and decision-makers see and learn about how true conservation of CESF, public safety, and some economic objectives can all be met. NEPA requires as much:

> The alternatives analysis must at least describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project . . . . [T]he key issue is whether the alternatives discussion encourages informed decision-making and public participation.

Sierra Club v. Tahoe Reg'l Planning Agency, 916 F.Supp.2d 1098 (E.D. Cal. 2013).

Further, as we discuss on page 23 of our initial scoping comments, the published, peer-reviewed science contradicts the Forest Service's modeling assumption that post-fire logging, by reducing woody biomass, somehow effectively reduces future fire intensity. Since we submitted our initial scoping comments, another Forest Service study has again drawn the obvious conclusion that if post-fire logging removes most of the woody biomass, there will be less woody biomass in the future, and *assumed* on this basis that future fire severity/intensity would be effectively reduced (Peterson et al. 2015). However, again, the empirical data do not support this assumption. Peterson et al. (2015) did not take into account the high combustibility of the areas artificially planted by the Forest Service after post-fire logging, or the highly pyrogenic nature of the invasive weeds (like cheatgrass) that proliferate significantly more after post-fire logging and herbicide spraying. When these factors are taken into account, the conclusion is that post-fire logging, and associated actions, do not effectively reduce future fire intensity/severity (McGinnis et al. (2010)), contrary to the assumptions in Peterson et al. (2015).

We therefore urge you to add at least one conservation-based alternative, as defined above, to your analysis in order to meet NEPA's intent and objectives. If you have any questions, or would like to discuss this further, please contact us.

Sincerely,

Chad Hanson, Ph.D., Director
John Muir Project of Earth Island Institute

Justin Augustine
Center for Biological Diversity