



April 13, 2015

Dave Martin, District Ranger, Bass Lake Ranger District  
comments-pacificsouthwest-sierra@fs.fed.us

**Re: French Project**

Dear District Ranger Martin:

On behalf of the John Muir Project of Earth Island Institute (JMP) and the Center for Biological Diversity (CBD), we are submitting these additional scoping comments on the current proposal to conduct post-fire logging, shrub removal, and artificial tree planting in the French fire area through the French Project (Project). As we discussed in our previous scoping comments, an Environmental Impact Statement (EIS) must be prepared under NEPA due to potentially significant adverse impacts to California spotted owls, Pacific fishers, black-backed woodpeckers, Yosemite toads, and mountain yellow-legged frogs.

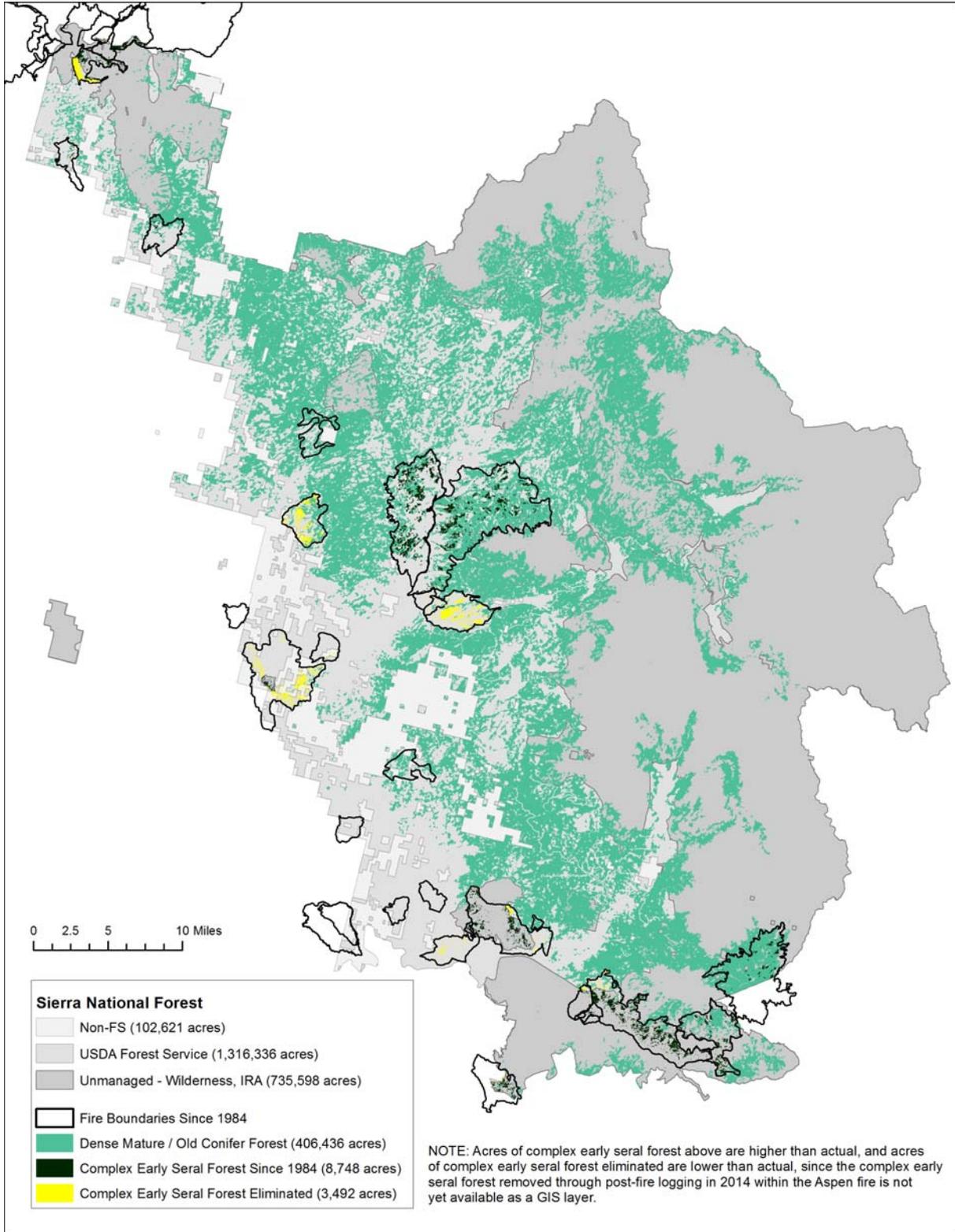
Moreover, our previous scoping comments discussed how “severe fire is currently in a deficit in the Sierras and is especially lacking on the Sierra Forest.” To further illustrate the severe lack of fire, and the associated lack of “complex early seral forest,”<sup>1</sup> we have now prepared a map showing the extreme rarity of complex early seral forest (created by high-intensity fire in dense, mature/old conifer forest) on the Sierra National Forest. As the map (below) shows, less than 1% of the Sierra National Forest is comprised of complex early seral forest (CESF) – approximately 8,750 acres of CESF (but without adjusting for loss from the Aspen fire post-fire logging Project) out of 1,316,336 acres on the Sierra National Forest.

The French Project scoping notice and proposed action appears to propose the logging of the majority, if not all, of the CESF habitat that is within the French fire area. As we discussed in our previous scoping comments, this CESF habitat is the rarest, most biodiverse, and most threatened forest habitat type in the Sierra Nevada. It represents important foraging habitat for spotted owls and fishers, and most of the shrub/ground nesting bird species that depend upon the montane chaparral (native shrub) component of CESF habitat for their survival have become rare and are declining in population, as found in Hanson (2014) (discussed in detail and cited in our previous scoping comments). Due to these factors, CESF represents ecologically critical areas/habitat on the Sierra National Forest. Because of the extreme rarity and ecological importance of CESF on the Sierra National Forest, and the potentially significant impacts that removal of much of the little remaining CESF will have on threatened, sensitive, and declining

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<sup>1</sup> See, e.g., DellaSala et al. 2014. “Complex early seral forests of the Sierra Nevada: what are they and how can they be managed for ecological integrity?”

wildlife species, an EIS must be prepared for the French Project. Please let us know if you have any questions about the CESF map below:



Sincerely,

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