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January 3, 2014

Susan Skalski, Forest Supervisor
Stanislaus National Forest
Randy Moore, Regional Forester
U.S. Forest Service Region 5 (California)

Re: Letter from Scientists on Proposed Postfire Salvage on the Stanislaus National Forest, central Sierra Nevada region, California

Dear Ms. Skalski and Mr. Moore,

As professional scientists with backgrounds in ecological sciences and natural resources management, we are writing in regards to your December 6, 2013 Notice of Intent to implement the “Rim Fire Recovery Project” on the Stanislaus National Forest portion of the 257,000-acre Rim fire of 2013 in the central Sierra Nevada region of California¹. Specifically, we write to express our deep concerns with your proposal to “salvage” log 29,648 acres of mostly moderate- and high-severity fire areas in the fire-adapted conifer forests on the Stanislaus National Forest. This logging activity would degrade most of the 32,910 acres of moderate/high-severity fire that occurred in mature conifer forests on national forest land. We are also concerned that your proposal under-estimates the cumulative impacts of postfire logging and its potential effects on ecological integrity and forest health. In particular, the proposal seems to violate the National Forest System Land Management Planning Rule of 2012 (36 CFR Part 219) that directs the Forest Service to maintain the ecological integrity of a planning area as it relates to “the completeness of wholeness of an ecosystem’s composition, structure, function, and connectivity.” Postfire logging is inconsistent with the intent of the planning rule as it would greatly diminish ecological integrity of important postfire wildlife habitat while removing habitat for at-risk species, as noted.

¹http://www.fs.usda.gov/wps/portal/fsinternet!/ut/p/c5/04_SB8K8xLLM9MSSzPy8xBz9CP0os3gDfxMDT8MwRydLA1cj72BTUwMTAwgAykeaxRtBeY4WBv4eHmFYT4GMHkidBvgAI6EdIeDXIvdrAJuM3388jPTdUvyA2NM MgyUQQAyrgQmg!!/dl3/d3/L2dJQSEvUUt3QS9ZQnZ3LzZfs000MjZOMDcxT1RVODBJN0o2MTJQRDMwODQ!/?project=43033

In particular, the rare Black-backed Woodpecker², which depends on larger patches of recent higher-severity fire occurring in dense, mature conifer forest, and is highly sensitive to even partial salvage logging, would be greatly impacted by proposed postfire logging³. The U.S. Fish & Wildlife Service determined that post-fire salvage logging on national forest lands is a key factor in the recent decline of this species. Moreover, in the fall of 2012, the Forest Service produced the Black-backed Woodpecker Conservation Strategy⁴ that this logging proposal contradicts. In order to conserve populations of this woodpecker and reduce further risks to its populations, the Conservation Strategy recommended that: a) the high quality Black-backed Woodpecker habitat should be identified after fire and should not be salvage logged; b) salvage logging should not occur during nesting season, while chicks are in the nest and cannot fly away; and c) where logging does occur, logged patches should not be > 2.5 ha. However, none of these recommendations are incorporated in your salvage logging proposal, which is of particular concern given that the largest tract of existing woodpecker habitat in the Sierra is on the Stanislaus National Forest within the Rim fire, and the current proposal would remove most of it. Further, the Black-backed Woodpecker is a designated management indicator species, or bellwether, of post-fire ecosystems of the Sierra, and such a massive salvage logging operation would cause irreparable harm to many wildlife species that also share its complex early seral habitat created by higher-severity fire.

We note that recent studies have documented the importance and rarity of complex early seral forests created by moderate/high-severity fire⁵. Yet the Forest Service's proposal would remove most of it in this area. In a study commissioned by the Forest Service and conducted in large higher-severity fire areas in the northern portion of the Sierra Nevada management region, scientists⁶ concluded: "Once the amount of the plot that was high severity was over 60% the density of cavity nests increased substantially...[M]ore total species were detected in the

²On April 9, 2013, the U.S Fish & Wildlife Service issued a determination that listing the genetically distinct population of Black-backed Woodpeckers in the Sierra Nevada and eastern Oregon Cascades under the Endangered Species Act "may be warranted."

³Hanson, C. T., and M. P. North. 2008. Postfire woodpecker foraging in salvage-logged and unlogged forests of the Sierra Nevada. *Condor* 110:777–782.

⁴Bond, M.L., R.B. Siegel, and D.L. Craig. 2012. A Conservation Strategy for the Black-backed Woodpecker (*Picoides arcticus*) in California—Version 1.0. The Institute for Bird Populations, Point Reyes Station, California, For: U.S. Forest Service, Pacific Southwest Region, Vallejo, CA.

⁵Swanson, M.E., J. F. Franklin, R.L. Beschta, C. M. Crisafulli, D.A. DellaSala, R.L. Hutto, D. B. Lindenmayer, and F. J. Swanson. 2010. The forgotten stage of forest succession: early-successional ecosystems on forested sites. *Frontiers in Ecology and Environment* doi:10.1890/090157. DellaSala, D.A., M.L. Bond, C.T. Hanson, R.L. Hutto, and D.C. Odion. In press. Complex early seral forests of the Sierra Nevada: what are they and how can they be managed for ecological integrity? *Natur Areas J.*

⁶Burnett, R.D., P. Taillie, and N. Seavy. 2010. Plumas Lassen Study 2009 Annual Report. U.S. Forest Service, Pacific Southwest Region, Vallejo, CA.

Moonlight fire which covers a much smaller geographic area and had far fewer sampling locations than the [unburned] green forest...[A]reas burned by wildfire, especially those with older high severity patches, may in some cases support equal or greater landbird diversity and total bird abundance [than unburned forest]...It is clear from our first year of monitoring three burned areas that post-fire habitat, especially high severity areas, are an important component of the Sierra Nevada ecosystem...[P]ost-fire areas are not blank slates or catastrophic wastelands; they are a unique component of the ecosystem that supports a diverse and abundant avian community.”

Likewise, in a separate study also commissioned by the Forest Service and conducted in the Sierra Nevada, researchers⁷ concluded that native fire-following shrubs are vitally important to biodiversity in complex early seral forest (CESF) created by high-intensity fire: “Many more species occur at high burn severity sites starting several years post-fire, however, and these include the majority of ground and shrub nesters as well as many cavity nesters. Secondary cavity nesters, such as swallows, bluebirds, and wrens, are particularly associated with severe burns, but only after nest cavities have been created, presumably by the pioneering cavity-excavating species such as the Black-backed Woodpecker. Consequently, fires that create preferred conditions for Black-backed Woodpeckers in the early post-fire years will likely result in increased nesting sites for secondary cavity nesters in successive years.” Similarly, researchers⁸ found that shrub dominated landscapes are critically important wildlife habitat: “while some snag associated species (e.g. black-backed woodpecker) decline five or six years after a fire [and move on to find more recent fire areas], [species] associated with understory plant communities take [the woodpeckers’] place resulting in similar avian diversity three and eleven years after fire (e.g. Moonlight and Storrie).”

Current studies also have concluded that complex early seral habitat, created by higher-severity fire, has declined substantially since the era of fire suppression⁹. Yet there are no forest plan provisions to protect this habitat. Thus, in closing, there is a consensus of scientific opinion that

⁷Siegel, R.B., M.W. Tingley, and R.L. Wilkerson. 2011. Black-backed Woodpecker MIS surveys on Sierra Nevada national forests: 2010 Annual Report. A report in fulfillment of U.S. Forest Service Agreement No. 08-CS-11052005-201, Modification #2; U.S. Forest Service Pacific Southwest Region, Vallejo, CA.

⁸Burnett, R.D., M. Preston, and N. Seavy. 2012. Plumas Lassen Study 2011 Annual Report. U.S. Forest Service, Pacific Southwest Region, Vallejo, CA.

⁹Nagel, T.A., and A.H. Taylor. 2005. Fire and persistence of montane chaparral in mixed conifer forest landscapes in the northern Sierra Nevada, Lake Tahoe Basin, California, USA. *J. of Torrey Botanical Society* 132: 442–457.

Odion, D.C., and Hanson, C.T. 2013. Projecting impacts of fire management on a biodiversity indicator in the Sierra Nevada and Cascades, USA: the Black-backed Woodpecker. *The Open For Sci J* 6: 14-23.

post-fire logging and artificial conifer plantation establishment is one of the most ecologically damaging activities that could occur after mixed-severity fire¹⁰.

We urge you to please fundamentally reconsider your proposal in light of the current science. Thank you for your consideration of these issues.

Sincerely,

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¹⁰Karr, J.R., Rhodes, J.J., Minshall, G.W., Hauer, F.R., Beschta, R.L., Frissell, C.A., and Perry, D.A., 2004. Postfire salvage logging's effects on aquatic ecosystems in the American West. *BioScience*, 54: 1029-1033. Hutto, R. L. 2006. Toward meaningful snag-management guidelines for postfire salvage logging in North American conifer forests. *Cons Biology* 20:984–993.
Hutto, R. L. and S. M. Gallo. 2006. The effects of postfire salvage logging on cavity-nesting birds. *Condor* 108:817–831. Lindenmayer, D.B., Burton, P.J., and Franklin, J.F. 2008. Salvage Logging and Its Ecological Consequences, 12-13. Island Press, Washington, D.C. Noss, R.F., J.F. Franklin, W.L. Baker, T. Schoennagel, and P.B. Moyle. 2006. Managing fire-prone forests in the western United States. *Frontiers in Ecol and Environ* 4: 481-487. DellaSala, D.A., et al. 2013. Open Letter to Members of Congress from 250 Scientists Concerned about Post-fire Logging, October 30, 2013
http://www.geosinstitute.org/images/stories/pdfs/Publications/Fire/Scientist_Letter_Postfire_2013.pdf

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