



October 10, 2017

Randy Moore
Regional Forester
USDA Forest Service
1323 Club Drive
Vallejo, CA 94592

Sent via email to: objections-pacificsouthwest-regional-office@fs.fed.us

Re: Objection to the Proposed Power Fire Reforestation Project

Dear Reviewing Officer Randy Moore:

The Center for Biological Diversity and John Muir Project (name, address and telephone are listed in the signature) object to the Forest Service's selection of Modified Alternative 3 for the Power Fire Project for the reasons discussed below. The Project is proposed on the Amador Ranger District of the Eldorado National Forest. The responsible official is Laurence Crabtree, Forest Supervisor, Eldorado National Forest.

In previous comments, we discussed our concerns with respect to the harm of replanting and using herbicides to control or eradicate shrubs. Ecological integrity and biodiversity are best maintained by protecting shrub habitat and allowing natural succession to proceed unimpeded. A recent report from the Power Fire area, Fogg et al. 2017, attached with this letter, reinforces yet again why it would be best to avoid replanting and using herbicide, or to at least greatly reduce the use of herbicide with respect to shrub eradication.

Fogg et al. 2017 found that shrub cover benefited all of the avian communities evaluated, with species richness and abundance associated with increasing shrub cover. For example, the report states that “[s]hrub cover . . . had the largest effect size of any variable in every guild model and was always positive. Our models predicted intermediate levels of shrub cover (40-60%) to be optimal. . .”

Herbicide treatments designed to control shrub cover, on the other hand, negatively affected avian species abundance and richness. The report explains that “[a]nalyzes examining the herbicide treatments in Freds Fire showed 37% higher ESF bird abundance and species richness at control points compared to treated points. The Open Mature Forest (OMF) bird guild showed 50% higher abundance at control points versus treated points and 60% higher species richness. These results show a significant difference between relatively intact shrub habitats and those manipulated to accelerate forest regeneration”

The Fogg et al. 2017 report recommends that the Power Fire landscape be managed as an early seral reserve where managed wildfire and prescribed fire would be used as the primary management tool. The report notes that “[i]f mastication or herbicide treatments are used to reduce shrub cover, these efforts could be strategically focused near mature tree patches to reduce fuels for reducing the likelihood of future high-severity fire. However, best management practices for shrub-nesting species would be to avoid disturbing this habitat for at least 20 years post-fire, to mimic the natural fire return interval in Sierra Nevada chaparral (Barbour and Major 1988), and to use prescribed fire or managed wildland fire as complimentary or alternative management tools (Coppoletta et al. 2015).”

We ask that the Project be reevaluated in light of the recommendations (e.g., pages 3-6 of the report) and findings in Fogg et al. 2017, and that herbicide use be dropped or greatly reduced. This is especially so given that the report is specific to the Power fire area and El Dorado National Forest, and is new information. For example, at the very least, a supplemental EIS should be conducted to address the report’s findings.

We look forward to discussing the report and hope it will be incorporated in a meaningful way to a Final Decision.

Sincerely,



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