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Organization: Sierra Club - Tuolumne Group
Title: Conservation Chair
Comments: Comments in response to Prather-Medusa Project Proposal To Forest Supervisor Jason Kuiken and the Prather-Medusa Project Team:

Thank you for the opportunity to comment on the Prather-Medusa Project Proposal. As you know, our Group supports the implementation of more forest treatments across more acres to promote healthy forest structure and function. However, we object to the proposed removal of large (>30[rdquo] dbh) conifers from aspen stands, especially when these large trees are located at significant distances from the aspen stands. Given the recent attempts by our Group and the YSS collaborative to reduce controversy in the SERAL Project, it is really unfortunate that the Medusa-Prather project has again proposed the removal of large trees over potentially large areas; a move that will only cause mistrust and raise red flags within the environmental community. If there was strong scientific evidence indicating that the removal of large conifers (up to 40[rdquo] dbh) from areas as far as 300 ft from an aspen stand was really necessary to promote aspen regeneration, then perhaps we might agree to this procedure. However, we know of no good scientific evidence that supports this approach. In fact, the most relevant, peer-reviewed study that we have found on effects of conifer removal on aspen regeneration does not require the removal of large trees up to 300 ft from aspen stands. In a study entitled [ldquo]Removal of Encroaching Conifers to Regenerate Degraded Aspen Stands in the Sierra Nevada[rdquo] by Jones and others (2005 - Restoration Ecology 13:373-379), the authors indicated in their methods that any large conifers that were removed were less than 30[rdquo] dbh (largest tree removed was actually 26[rdquo] dbh). In addition, no conifers were removed if they were farther than 30 feet from an aspen stand. It is important to note that these much less controversial removal criteria still were effective and resulted in a significant increase in total aspen stem density. We would ask the Medusa-Prather Project team to follow the best science available and refrain from the removal of conifers larger than 30[rdquo] dbh and definitely refrain from large conifer removal greater than 30 ft from an aspen stand.

In addition, previous studies on the rehabilitation of aspen stands by conifer removal have repeatedly indicated that any beneficial effects of conifer removal can be eliminated by excessive livestock browsing of aspen stands. We would hope that livestock would not be allowed into the aspen stands within the Prather-Medusa project area because this would likely eliminate any of the benefits of conifer removal. In conclusion, our Group recognizes that the lack of fire in these aspen stands has resulted in encroachment of the stands by conifers. We also understand that the removal of some conifers within these stands will help to promote aspen regeneration. However, we do not see the scientific evidence supporting the removal of large conifers and especially the removal of large conifers farther than 30 ft from an aspen stand as an approach to increase aspen regeneration. Thank you again for considering our comments on the Medusa-Prather Project.

Sincerely,

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