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Title:

Comments: Hi Heather, I tried to submit a second round of comments through the online portal but the comment field did not come up again, so I'm sending this brief additional comment to you, with some attachments.

1: Please consider the following regarding impacts of logging on wolves. Gray wolves and ungulates (deer and elk) both preferentially select unmanaged higher-severity fire areas, because the rich understory vegetation stimulated by intense fire provides optimal food for ungulates, and higher ungulate abundance provides prey for wolves (Lewis et al. 2022), but logging of live trees in green forest, and post-fire logging of higher-severity fire patches, both significantly reduce the presence of ungulates due to severe reduction of hiding cover from live tree and snag removal, even when herbicides are not used to eliminate non-conifer post-fire understory vegetation that ungulates depend upon for food (Hebblewhite et al. 2009). The reduction or elimination of native post-fire vegetation that ungulates eat, due to herbicide spraying, as the Forest Service proposes to do with the massive amount of post-fire logging at issue here, would exacerbate these impacts further. Other research also finds that logging reduces habitat for deer, adversely impacting wolves (Darimont and Paquet 2002), and that wolves tend to avoid areas with anthropogenic disturbances, especially various types of logging (Lesmerises et al. 2012). Please see attached studies or their abstracts.

2: The hundreds of thousands of acres of proposed mechanical thinning and post-fire logging proposed in this project would severely threaten the California spotted owl. See attached studies and comments.

3: The Pacific fisher actively forages and in some cases selects higher-intensity fire areas where they occur in dense, mature forest, and selects dense, mature forest that is unburned as well (see attached). The proposed logging here would severely threaten the fisher.

4: As the many scientific studies, including USFS studies, find in the attached thinning/fire fact sheet, thinning does not stop wildfires, kills more trees than it prevents from being killed, and dramatically increases carbon emissions relative to wildfire alone, while denser, mature forests tend to burn at lower intensities, due to a cooler, shadier, and less windy microclimate.

5: Snag forest habitat, a.k.a., complex early seral forest habitat, created by high-intensity fire occurring in mature/old forest, is one of the most biodiverse and wildlife-rich forest habitat types, and many native wildlife species are substantially or primarily associated with this habitat. The proposal would degrade or eliminate many tens of thousands of acres of this unique habitat.

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Attachments:

CSO FESA USFWS listing proposal JMP et al. 60 day comments 24Apr23 final.pdf

CSO Hanson, Bond, and Lee 2018.pdf

CSO Hanson, Lee, and Bond 2021.pdf

CSO Lee 2020 reply to Jones et al 2020.pdf

Fire Hanson 2013 fisher & fire study.pdf

Fire Hanson 2015 fisher & fire .pdf

JMP fact sheet snag forest habitat 16Feb21.pdf

JMP fact sheet thinning and fire Oct2023.pdf

Wolves & logging Darimont and Paquet 2002.pdf

Wolves & logging Hebblewhite et al. 2009.pdf

Wolves & logging Lesmerises et al. 2012 Forest Ecology and Management Vol 276 pp 125-131 .pdf

Wolves & logging Lewis et al 2022 large mammals benefit from higher severity fire including wolves.docx